



---

AMERICAN ACADEMY *of* ACTUARIES

---

December 20, 2012

Office of Management and Budget  
Office of Information and Regulatory Affairs  
Attention: CMS Desk Officer

Re: Initial Plan Data Collection to Support QHP Certification and Other Financial Management and Exchange Operations [CMS-10433]

To Whom It May Concern:

On behalf of the members of the American Academy of Actuaries'<sup>1</sup> Actuarial Value Subgroup, I appreciate this opportunity to respond to the request for comments on plan data collection requirements. This letter supplements our recently submitted comment letter on actuarial value related issues in "Proposed Standards Related to Essential Health Benefits, Actuarial Value, and Accreditation."<sup>2</sup>

As noted in the request for comments, issuers must meet minimum certification standards to have their plans certified as Qualified Health Plans (QHP) by an exchange. These standards include actuarial value (AV) standards. We request clarification on whether and how any AV-related data collection elements required to meet certification standards will be consistent with the data elements in the AV calculator.

Thank you for your consideration of this issue. If you have any questions or would like to discuss this further, please contact Heather Jerbi, the Academy's senior health policy analyst (202.785.7869; [Jerbi@actuary.org](mailto:Jerbi@actuary.org)).

Sincerely,

Cori E. Uccello, MAAA, FSA, FCA, MPP  
Senior Health Fellow and Chairperson, Actuarial Value Subgroup  
American Academy of Actuaries

---

<sup>1</sup> The American Academy of Actuaries is a 17,000-member professional association whose mission is to serve the public and the U.S. actuarial profession. The Academy assists public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualifications, practice, and professionalism standards for actuaries in the United States.

<sup>2</sup> Available at [http://www.actuary.org/files/Acad\\_comments\\_on\\_AV\\_rule\\_FINAL\\_12\\_18\\_2012.pdf](http://www.actuary.org/files/Acad_comments_on_AV_rule_FINAL_12_18_2012.pdf)