



June 25, 2018

The Honorable Alex Azar
Secretary, Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: 83 FR 26485

Submitted Electronically via www.regulations.gov

Dear Secretary Azar:

I am writing on behalf of the National Association of Health Underwriters (NAHU), a professional association representing more than 100,000 licensed health insurance agents, brokers, general agents, consultants and employee benefits specialists. We are pleased to offer comments in response to your request for information published in the *Federal Register* on June 7, 2018, about a planned initiative to develop a working group to facilitate a constructive, high-level discourse between HHS leadership and those focused on innovating and investing in the healthcare industry.

The members of NAHU are very supportive of your idea to create a working group and encourage you to engage in other types of interaction with leaders who are focused on innovation and investment in healthcare as well. We agree that such a dialogue could help spur investment, increase competition and accelerate improvement that will benefit the health and well being of all Americans. You note in your request for information that you plan to include representatives from healthcare innovation-focused companies, healthcare startup incubators, investment professionals, healthcare-focused private equity and venture capital firms, and other lenders to healthcare investors and innovators in your discussions. NAHU understands the desire to focus on those funding the investment in healthcare advances and technology, as well as those entities and individuals who are creating new products and services. However, you asked for additional information and ideas, and NAHU would like to suggest that you also consider including representation from healthcare consumers on your working group and in your dialogue structure, with a particular focus on the business consumers of healthcare.

The members of NAHU work on a daily basis to help individuals and employers purchase, administer and utilize health insurance coverage and make the most of the healthcare services available to them. On the business side of the healthcare purchasing equation, NAHU members know firsthand that there is a great desire by employers of all sizes and industries to be actively engaged in healthcare transformation. Employer-based health insurance is the cornerstone of the American healthcare delivery and financing system, covering more than half of the country. Survey data regularly shows that Americans very much



value their ability to obtain private-market health insurance coverage through their employers, due to the ease of purchasing, the cost-subsidy and tax advantages, and the access to innovations in health care delivery and technology that they might not be able to obtain as single purchasers. Furthermore, American businesses owners invest heavily in the healthcare needs of their employees. Employers both want to ensure their workforce stays healthy and productive, and give their employees access to innovations and cost-savings that meet the unique needs of their specific organizations and employee populations. By including representatives of businesses who are focused on providing healthcare innovations to real people in your dialogue, we believe that you will be able to gather more ideas about where there may be regulatory or other barriers to accessing innovations and also get critical information about the type of improvements consumers need.

As an entity of professionals who represents and works with businesses of all sizes on satisfying their healthcare needs, and also serves millions of individual healthcare consumers, we happily volunteer our services to your department to provide additional information about the needs and wishes of healthcare consumers when it comes to both financing and innovation. We sincerely appreciate the opportunity to answer your request for information and your commitment to gathering the viewpoints of all stakeholders. If you have any questions about our comments, or if NAHU can be of assistance as you move forward in your quest to start a healthcare innovation dialogue, please do not hesitate to contact me at (202) 595-0787 or jtrautwein@nahu.org.

Sincerely,

A handwritten signature in black ink, reading "Janet Stokes Trautwein". The signature is written in a cursive style.

Janet Stokes Trautwein
Executive Vice President and CEO
National Association of Health Underwriter