



MISSOURI ASSOCIATION OF OSTEOPATHIC
PHYSICIANS & SURGEONS



November 10, 2015

John Huff
Director
Missouri Department of Insurance
Financial Institutions & Professional Registration
P.O. Box 690
Jefferson City, MO 65102-0690

Dear Mr. Huff:

You are aware of concerns raised by two proposed mergers of national insurers — Aetna with Humana and Anthem with Cigna. We share those concerns as they apply to Missouri. It appears that the mergers, if consummated, would have a particularly worrisome effect in Missouri's Medicare Advantage market. A combined Aetna-Humana entity would have a statewide market share of 52.7 percent. The consequences are even more pronounced in regional markets. An analysis by the Henry J. Kaiser Family Foundation concluded that the product of an Aetna-Humana merger would have 61 percent of the Medicare Advantage market in Greene County and 80 percent in Jackson County.

These mergers warrant careful scrutiny by federal and state officials. They certainly pose a potential risk of anti-competitive or other adverse implications. We ask that your department conduct a thorough review under the authority of its applicable statutes and regulations.

Also, we urge your favorable consideration of a pending proposal to create a special committee of the National Association of Insurance Commissioners to review the proposed mergers. Such a committee would bring the collective expertise of the NAIC to consider issues and potential remedies involving multi-state markets, insurance regulatory issues beyond traditional anti-competitive assessments and the cumulative effects of the two proposed mergers.

Sincerely,

Brian Bowles
Executive Director
Missouri Association of
Osteopathic Physicians & Surgeons

Herb B. Kuhn
President and CEO
Missouri Hospital Association

Thomas L. Holloway
Executive Vice President
Missouri State Medical Association

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