



June 17, 2009

Kristin Lewis
Director, Public Policy & Government Affairs
Tufts Health Plan
705 Mt. Auburn Street
Watertown, MA 02472

Re: Claims Projections and Reserve Factors Applicable to Tufts Health Plan Large Group and Small Group Subscription Rates, Filed May 15, 2009

Dear Ms. Lewis:

The Office of the Health Insurance Commissioner has examined the above-referenced filings and has significant concerns about the affordability of Tuft's projected rates in the small and large employer group markets. Our concerns make approval of your rate filings impossible at this time.

The state's economy has declined to levels not seen in a generation. Currently, the state's economy unemployment rate in Rhode Island exceeds 11 percent. Last year, Rhode Island's economy shrank almost 1 percent, the fourth-worst performance of any state in the Union. Economists predict that Rhode Island will continue to have significant job losses this year and next. They also expect negative growth in the state's gross domestic product this year and perhaps next. When these bleak statistics are layered on top of double-digit, or nearly double digit, annual increases in overall health insurance costs over the last decade, one thing has become clear: Rhode Island employers and employees have reached a tipping point with respect to their ability to pay for health insurance. We are in a crisis and our health care system simply cannot go forward as we have in the past. If accepted, the filed rate factors would only exacerbate the current cost spiral by further raising business costs. This is simply not acceptable.

At the outset of this process, I made available to the public detailed financial and actuarial information about your company's filings. Hundreds, perhaps thousands, of employers, members of the public, health policy experts, members of the General Assembly and other political figures have reviewed this information. Over the last few weeks I have solicited and

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received comments from the many members of the public who wished to weigh in on the filings. I have also heard from members of our General Assembly, the Department of the Attorney General, and other political leaders. The opposition to your company's proposed increases is unanimous and the reasons cited were almost always the same: the state's dire economic condition makes double-digit increases in the cost of health insurance untenable.

For these reasons, I am compelled to request that Tufts withdraw its request for a rate increase. If Tufts does not do so by Friday June 26, 2009, I will assume that Tufts wishes to proceed to a rate hearing and will schedule a hearing pursuant to R.I. Gen Laws §§ 27-19-6 and 27-20-6.

If you have any questions, please feel free to call me.

Very truly yours,

A handwritten signature in blue ink that reads "Christopher F. Koller". The signature is written in a cursive style with a large initial 'C'.

Christopher F. Koller
Health Insurance Commissioner