

**Office of  
Consumer Health Insurance  
2008 Annual Report**

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# Illinois Department of Financial and Professional Regulation

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## Division of Insurance

**PAT QUINN**  
Governor

**Michael T. McRaith**  
Acting Secretary

**Michael T. McRaith**  
Director  
Division of Insurance

January 31, 2009

**To:** Pat Quinn, Governor  
Michael McRaith, Acting Secretary  
Michael McRaith, Director of Insurance  
Members of the General Assembly

**From:** The Office of Consumer Health Insurance/Uninsured Ombudsman

**Re:** The Office of Consumer Health Insurance 2008 Annual Report

The Office of Consumer Health Insurance (OCHI) is pleased to submit its 2008 Annual Report as required by the Managed Care Reform and Patient Rights Act (Public Act 91-0617).

OCHI has completed nine full years of operation within the Division of Insurance and continues to act as an essential resource for consumers with health insurance questions and as a valuable ally for Illinois citizens seeking health insurance.

We anticipate continued success in the upcoming years and value any comments or suggestions you may have.

## TABLE OF CONTENTS

|   | <b>Page<br/>No.</b> |
|---|---------------------|
| <b>1.</b> HELPING CONSUMERS UNDERSTAND THEIR HEALTH INSURANCE AND APPEAL RIGHTS. . . . .  | 1                   |
| <b>2.</b> EDUCATING ENROLLEES ABOUT THEIR HEALTH INSURANCE RIGHTS. .  | 3                   |
| <b>3.</b> EXPANDING PUBLIC KNOWLEDGE OF OCHI AND AVAILABLE SERVICES / STATUS REPORT OF OCHI TOLL-FREE TELEPHONE LINE. .   | 6                   |
| <b>4.</b> UNINSURED OMBUDSMAN PROGRAM. . . . .  | 8                   |
| <b>5.</b> MARKET STATUS, GOVERNMENT ACTIONS, AND RECOMMENDATIONS FOR IMPROVEMENTS TO HEALTH INSURANCE REGULATION. . . . .   | 14                  |
| <b>6.</b> EXHIBITS: 1 – OCHI Calls Received (by Zip Code)<br>2 – Calls received by OCHI (by Category) (Top 10)<br>3 – Materials Sent to Consumers by OCHI (Top 10)<br>4 – Calls Received by OCHI Per Month<br>5 – HMO Company Complaint Record -- General Summary 2007<br>6 – HMO Company Complaint Record -- Classification Summary 2007<br>7 – HMO External Independent Review Summary 2007 |                     |

## PREFACE

Established on January 1, 2000, by the Managed Care Reform and Patient Rights Act (the Act), the Office of Consumer Health Insurance (OCHI) operating within the Illinois Department of Financial and Professional Regulation (IDFPR), Division of Insurance (Division) (IDFPR) continued to serve Illinois residents in 2008 by responding to their health-related inquiries.

The responsibilities of OCHI, as set forth by the Act, have not changed since its inception. Its two main functions are to assist consumers in relation to their health insurance needs and to report annually on the state of the health insurance marketplace. OCHI provides assistance to Illinois consumers through a toll-free, consumer inquiry telephone number and through other outreach mechanisms including speaking engagements, health fairs, radio and television interviews, and the distribution of consumer-friendly fact sheets. Through these media, OCHI helps consumers understand their insurance coverage, advises persons of their rights under insurance policies, assists insureds in filing appeals and complaints, and provides appropriate resources to Illinois residents who need assistance.

In assessing the overall state of the health insurance marketplace in Illinois, OCHI reviews state and federal legislation and regulations, monitors significant trends affecting health coverage for Illinois citizens, identifies specific problems faced by health insurance consumers, and sets forth specific recommendations to address those problems.

In 2002, the Division expanded the OCHI mission to include the administration of the Uninsured Ombudsman Program (Ombudsman) established by Public Act 92-0331 (20 ILCS 1405/1405-25). The Ombudsman is responsible for providing assistance and education to individuals regarding health insurance benefit options and rights under state and federal laws. The Ombudsman also counsels uninsured individuals on finding and shopping for insurance, evaluating insurance products, comparing options when buying health insurance coverage, and providing information on non-insurance resources available throughout the state.

## EXECUTIVE SUMMARY

The Managed Care Reform and Patient Rights Act (215 ILCS 134/1 et. seq.) established the Office of Consumer Health Insurance (OCHI) in January 2000. In 2008, OCHI's ninth year of operation, the Office received 14,229 calls (increased from 14,204 calls in 2007) and provided consumers with a broad range of health coverage information. OCHI staff also performed outreach activities, including assisting health insurance consumers at the State Fair and providing information on various radio and television talk programs.

Section 1 of this report describes the types of calls received by OCHI and the kinds of assistance provided to callers.

Section 2 describes the various activities of the OCHI staff, including steps taken to educate consumers about their health plans, and the production of consumer fact sheets made available on the Division's Internet site.

Section 3 documents efforts to expand public knowledge of OCHI and its services, and provides details on the number of calls received during the year.

Section 4 describes activities of the Uninsured Ombudsman Program and steps taken to assist uninsured consumers, including: assisting in the search for health insurance, helping to access local services at community-sponsored health centers, and providing information on the availability of state and federal health-related programs.

Section 5 contains information about the status of the state's health insurance marketplace, government actions affecting health coverage options, and recommendations for improving health insurance regulation.

Section 6 contains the Report's exhibits.

## 1. Helping Consumers Understand Their Health Insurance and Appeal Rights

The Office of Consumer Health Insurance (OCHI) responded to a wide array of questions from consumers during calendar year 2008. Calls came from a variety of individuals and groups, including consumers, employers, agents, associations, attorneys, health care providers, and advocacy groups.

OCHI provides the information and education that consumers need to understand their health coverage. OCHI staff often help consumers define in practical terms the meaning of complex, insurance-specific words and phrases. OCHI staff also explain differences between benefits available in individual, small group, and large group insurance products, and related rights guaranteed by the Health Insurance Portability and Accountability Act (HIPAA)(215 ILCS 97/1 et. seq.). Consumers are also provided plan-specific information, including continuation of coverage options. In addition to providing one-on-one consumer consultations, OCHI also refers consumers to the Division of Insurance (“Division”) link on the Department of Financial and Professional Regulation’s Internet site ([www.idfpr.com](http://www.idfpr.com)), enabling them to learn more about a particular topic from one of the Division’s many user-friendly fact sheets.

In 2008, OCHI received calls requesting information on many topics, including information about new laws passed by the Illinois General Assembly and how to:

- obtain approval for a particular medical service or approval of benefits for a particular medical service;
- understand and file appeals with the health plan;
- appeal a claim denial for pre-certified services;
- request an external independent review with HMO plans; and
- file a complaint with the Division of Insurance.

OCHI guided HMO enrollees with denied claims as the enrollees initiated the external independent review process, a process mandated by the Managed Care Reform and Patient Rights Act. Among other things, OCHI staff explained the information needed by the independent reviewer, the relevant time periods, and the role played by the patient’s primary care physician.

The Managed Care Reform and Patient Rights Act requires HMOs to track all complaints received, regardless of the source, and to report the data to the Division. Exhibit 5 (HMO Company Complaint Record – General Summary 2007) contains a general summary of HMO complaints for 2007. Exhibit 6 (HMO Company Complaint Record – Classification Summary 2007) contains a listing of HMO complaints by category. Exhibit 7 (HMO External Independent Review Summary 2007) is derived from Exhibits 5 and 6 and provides specific information relating to external independent reviews. The external independent review data found in Exhibit 7 is

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provided by the plans and is not independently verified by the Division. These exhibits may be accessed through the Division's website at [http://www.idfpr.com/DOI/Complaints/healthCarePlan\\_complaints/CompanyComplaint2007.pdf](http://www.idfpr.com/DOI/Complaints/healthCarePlan_complaints/CompanyComplaint2007.pdf)

and

[http://www.idfpr.com/DOI/Complaints/healthCarePlan\\_complaints/ExternalReview2007.pdf](http://www.idfpr.com/DOI/Complaints/healthCarePlan_complaints/ExternalReview2007.pdf)

As detailed in Exhibit 5, during calendar year 2007, HMOs reported a total of 4,069 complaints, of which 423 (10.4%) were also filed with the Division. According to data submitted by the companies and displayed in the "Disposition of ALL Complaints" section of Exhibit 5, of the 4,069 total complaints:

- 1,501(37%) complaints were granted relief;
- 214 (5%) were granted partial relief;
- 1,098 (27%) received additional information; and
- 1,256 (31%) received no relief.

Exhibit 7 shows that HMO enrollees requested and received 69 external independent reviews of claims denied by Illinois HMOs in 2007. Of the 69 external independent reviews:

- 14 (20%) were granted relief;
- 1 (1.5%) were granted partial relief;
- 1 (1.5%) received further information; and
- 53 (77%) had no change in status.

The reporting date for 2007 complaint data is March 1, 2008. Complaint data for 2008 will be addressed in the 2009 report.



## 2. Educating Enrollees About Their Health Insurance Rights

As in previous years, several large and small employers declared bankruptcy in 2008, generating many calls to OCHI regarding federal COBRA and Illinois laws granting rights to continue group coverage. OCHI communicated the most up-to-date information to consumers. Many of the displaced workers were referred to the Illinois Comprehensive Health Insurance Plan (CHIP)(215 ILCS 105/1 et. seq.) to determine their eligibility under Illinois' HIPAA alternative mechanism for individual health insurance coverage.

When applicable, workers losing their insurance were also informed of the federal Trade Adjustment Assistance Reform Act of 2002, which offers a tax credit for certain workers and retirees who lose their employer-sponsored health coverage due to international dislocation or increased imports.

Many retired workers asked OCHI how they could purchase or otherwise coordinate other health coverage with Medicare. After providing the retired workers with basic information on guaranteed issue Medicare supplement coverage offered by standard insurers, OCHI staff referred the retired workers to the Division's Senior Health Insurance Plan (SHIP).

The Division continues to create and provide fact sheets in response to questions received from Illinois consumers in an effort to simplify complex insurance issues that are important to consumers. These fact sheets are available on the Division's website ([http://www.idfpr.com/DOI/Main/Consumer\\_Facts.asp](http://www.idfpr.com/DOI/Main/Consumer_Facts.asp)). For callers unable to access this information via the Internet, requested materials were mailed.

OCHI staff gave presentations to a variety of organizations including consumer organizations, community development organizations, and employer organizations. An OCHI representative also spoke on several radio talk shows.

Occasionally, calls to OCHI require the services of a translator. The OCHI office can generally provide a translator for consumers who need this service. The fact sheets entitled, *Your Rights Under the Managed Care (HMO) Reform and Patient Rights Act* and the *Ombudsman Brochure for the Uninsured* are available in Spanish.

The following is a list of consumer fact sheets and other information currently available on the Division's Internet site. Fact sheets revised or created during 2008 are displayed in bold.

- Acronyms for Life, Accident & Health Insurance and Manage Care
  - **Autism - Insurance Coverage**
  - Beware of Fraudulent Insurance Companies
  - Birth Control Is Now Covered
  - Cancer
  - **Claim Denial - What to do if an insurer denies your claim**
  - Contact the Proper Agency – Where to File Medicare, Medicaid and Other Health Plan Complaints
  - Continuation Rights - COBRA
  - Continuation Rights - Illinois Law
  - Continuation Rights - Illinois Spousal Law
  - Continuation Rights - Dependent Children (July 1, 2004)
  - Continuation Rights - Municipal Employee
  - Coordination of Benefits (COB)
  - **Dependent Child Coverage Fact Sheet - HB 5285**
  - Diabetes
  - Disability Income Insurance
  - Finding a Reputable Insurance Company – Using Financial Rating Agencies
  - Getting off to a Good Start with Medicare
  - HIPAA - Preexisting Conditions
  - Health Insurance for Small Employers
  - Health Maintenance Organizations (HMOs)
  - Individual Accident and Health Insurance - Frequently Asked Questions
  - Individual Major Medical Insurance
  - **Infertility Treatment**
  - Insurance Guaranty Associations
  - Insurance Coverage for College Students
  - Managed Care Reform and Patient Rights Act
  - **Mandated Benefits, Offers, and Coverages for Accident & Health Insurance and HMOs**
  - Maternity Benefits in Illinois
  - Medical Necessity
  - **Medicare Supplement Insurance**
  - Mental Health Coverage
  - Newborn Children
-

- Prompt Pay Law
- Self-Insured Health Plans
- Senior Health Insurance Program
- Small Employer Health Insurance Rating Act
- Travel Insurance
- Understanding the Consumer Complaint Process
- Uninsured Ombudsman Program
- Usual and Customary Fees in Health Insurance Claims
- **Women's Health Care Issues**
- Workers' Compensation Insurance

### **3. Expanding Public Knowledge of OCHI and Available Services/ Status Report of OCHI Toll-Free Telephone Line**

OCHI continues to use new venues and technologies to reach consumers and consumer groups, and continues to perform valuable research for consumers seeking answers to general and specific health insurance questions.

Awareness of OCHI services has been promoted in various ways, including: speaking on radio talk-shows and with local newspapers, taking part in Rapid Response Meetings for dislocated workers who have lost insurance coverage, coordinating with local agencies that provide services to Illinois residents, and actively engaging government officials, insurance agents, and insurance companies.

OCHI receives calls from consumers regarding the entire spectrum of health coverage issues, issues that often concern specific diseases or conditions and the related financial burdens faced by those who are uninsured or underinsured. To provide answers to consumer questions, OCHI staff is trained to understand relevant sections of the Illinois Insurance Code and the Illinois Administrative Code. General familiarity with certain federal laws and regulations (e.g., the Employee Retirement Income Security Act (ERISA) and COBRA (federal health coverage continuation rights)) is also a necessity. Given the disease and community-specific coverage questions and challenges faced by consumers, OCHI staff utilize additional resources, including the Internet and other state and local agencies (e.g., state and local public health departments), to provide clear and helpful answers. In many cases, OCHI directs uninsured and underinsured consumers to providers of low-cost or subsidized medical services.

OCHI continues to identify government agencies and associations that provide emergency services to persons in need of assistance for specific health care conditions. As new information is obtained, it is entered into the OCHI database as a potential resource for future callers.

#### **Status Report for OCHI's Toll-Free Telephone Number**

OCHI received a total of 14,229 calls on its toll-free telephone number (877-527-9431) during calendar year 2008. Since its inception in 2000, OCHI's toll-free telephone number has received approximately 137,033 phone calls.

## **Other Duties as Assigned by the Director**

During the early years of OCHI, benchmarks were established for OCHI staff to ensure prompt consumer assistance. For example, OCHI staff immediately responds to approximately 85% of incoming calls; OCHI returns more than 99% of all voicemail messages within one hour of receipt; OCHI strives to directly answer the consumer's questions while on the phone or researches the issue of concern and responds to the consumer within 24 hours. OCHI continues to meet all its consumer assistance benchmarks.

During 2004, OCHI staff began handling written consumer inquiries. These inquiries are received via regular mail, fax, or electronically, via on-line complaint or via the Division's consumer email address ([consumer\\_complaints@ins.state.il.us](mailto:consumer_complaints@ins.state.il.us)). OCHI staff handles basic consumer complaints received through these channels.

The OCHI staff's broad base of health insurance knowledge, combined with the database of information compiled by the Uninsured Ombudsman Program, allowed OCHI to handle approximately 1,215 written inquiries and 311 complaints in 2008. Handling of inquiries and basic complaints by OCHI allows the Division's Consumer Service staff to focus on more complex consumer inquiries and complaints.

OCHI also assists in responding to inquiries sent to the email address of the Director of the Division of Insurance (Director) This email address, [director@ins.state.il.us](mailto:director@ins.state.il.us), is posted on the Division's website for consumers to send insurance questions. In 2008, OCHI staff replied to 347 consumer inquiries sent to the Director's email address.

#### **4. Uninsured Ombudsman Program**

In January 2002, the Uninsured Ombudsman Program (Ombudsman) was established within OCHI to educate uninsured Illinois residents about health insurance options and benefits, including an explanation of rights guaranteed by state and federal law. The Ombudsman also informs uninsured and underinsured consumers about available low-cost or subsidized medical services.

Since its inception, the Ombudsman staff has worked with various state and local agencies to build a database of local resources that provide medical services to the uninsured and underinsured populations. Information in the database includes resources for medical, dental, mental health, prescription drug, vision, and other available health care services by county and city.

For calendar year 2008, the Ombudsman staff handled 1,191 telephone calls. As in previous years, calls came from uninsured persons and from a variety of individuals and organizations providing assistance to the uninsured, including other state agencies, legislators, insurance agents, radio stations, and family and friends. The Ombudsman staff continues to heighten the program's public profile by, among others things, regularly participating on radio talk shows and participating at pre-layoff workshops for dislocated workers. In 2008, an Ombudsman staff member was a guest on the television show "Pamela Speaks" (Springfield, IL) and also participated in the Green County Health Fair, Lincoln Community Health Fair, and Eureka Grand Chapter Health Fair. In addition, an Ombudsman representative sat on the "Cover the Uninsured Week" panel, spoke before the American Association of Medical Assistants, and appeared at the Farm Resource Center Conference and the Immigration Workshop Series in the Village of Skokie.

As in previous years, the Ombudsman staff actively participated on the Rapid Response Team for Dislocated Workers. At meetings organized by the team, members from various agencies answered dislocated workers' questions and provided the most current information about local resources and services. The Ombudsman staff provided: critical information about continuation rights available through the employer group health insurance plan; tips on how to shop for health insurance; information regarding special enrollment rights under HIPAA (e.g., HIPAA allows dislocated workers to enroll on a spouse's employer group health plan); and the Division's contact information in case the dislocated worker needs further assistance.

The right of dislocated workers to continue health insurance coverage through their former employer, whether pursuant to state continuation laws or federal COBRA laws, is a major topic of discussion if the employer group health plan remains in existence. Ombudsman staff provide detailed continuation of coverage information to workers and their families, including information regarding the ability of qualified beneficiaries to enroll separately under COBRA. The separate enrollment information is valuable at a time of financial hardship – the employee may have a dependent (e.g., son, daughter, or spouse) that

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insurance companies refuse to cover in the individual market due to the dependent's past or present medical condition.

Goals for 2009 include continuing to increase public awareness of the Ombudsman Program, establishing new partnerships and strengthening existing relationships with local organizations, and continuing to effectively assist the uninsured, especially in this time of economic turmoil.

Details of the Ombudsman's rapid response meetings and media outreach activities follow:

| <b>Rapid Response Meeting</b>                              |                 |                                     |
|--|-----------------|-------------------------------------|
| <b>Company</b>   | <b>Location</b> | <b>Number of Impacted Employees</b> |
| ADM Packaged Oils  | Granite City    | 30                                  |
| Alton Steel  | Alton           | 41                                  |
| American Coal  | Galatia         | 187                                 |
| Arrow Group Employees                                      | Breese          | 35                                  |
| ASF Keystone (American Steel)                              | Granite City    | 135                                 |
| ATS (Automotive Technology Systems)                        | Lawrenceville   | 286                                 |
| Casey Tools and Machine                                    | Mattoon         | 60                                  |
| Celanese Emulsions   | Meredosia       | 50                                  |
| Covenant Care Nursing Home                                 | O'Fallon        | 70                                  |
| Illinois Department of Children and Family Services (DCFS) | Statewide       | 200                                 |
| Fedders USA  | Effingham       | 12                                  |
| Glazer   | Champaign       | 30                                  |
| Glazer Hamburg Distributing                                | Collinsville    | 23                                  |
| Gourmet Express  | Gridley         | 36                                  |

| <b>Rapid Response Meeting</b>   |                    |                                     |
|---------------------------------|--------------------|-------------------------------------|
| <b>Company</b>                  | <b>City</b>        | <b>Number of Impacted Employees</b> |
| GSI Commerce                    | Edwardsville       | 75                                  |
| High Concrete                   | Paxton             | 60                                  |
| Jewel Food Store                | Dixon              | 60                                  |
| Mitsubishi Motors North America | Bloomington/Normal | 128                                 |
| Modern Care                     | Jacksonville       | 63                                  |
| Monterey Coal                   | Carlinville        | 350                                 |
| Mueller Company                 | Decatur            | 42                                  |
| North American Lighting         | Salem              | 98                                  |
| OCE Imaging Supply              | Charleston         | 25                                  |
| Quebecor World Pettys           | Effingham          | 40                                  |
| Quip Industries                 | Carlyle            | 60                                  |
| Ryan's Steakhouse               | Swansea            | 60                                  |
| SLM Trans Inc                   | Sumner             | 58                                  |
| Spartan Light Metal Products    | Sparta             | 30                                  |
| St. Mary's Cement               | Dixon              | 90                                  |
| Triangle Center                 | Springfield        | 20                                  |
| TRW                             | Marshall           | 114                                 |
| TSI Graphics                    | Effingham          | 4                                   |
| U.S. Steel                      | Granite City       | 2,000                               |
| Value City Store                | Alton              | 45                                  |
| Value City Store                | Collinsville       | 45                                  |



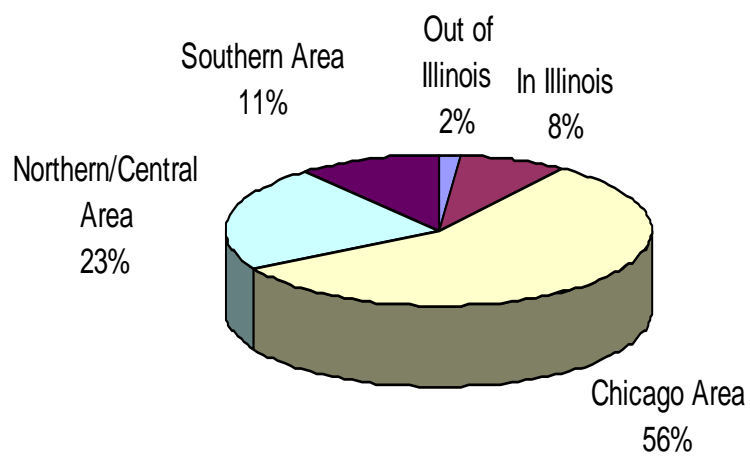
| <b>Rapid Response Meeting</b> |             |                                     |
|-------------------------------|-------------|-------------------------------------|
| <b>Company</b>                | <b>City</b> | <b>Number of Impacted Employees</b> |
| Value City Store              | Greenville  | 50                                  |
| Value City Store              | Swansea     | 50                                  |
| ZF Boge                       | Mattoon     | 4                                   |

| <b>Media Outreach</b> |                |                         |                                     |
|-----------------------|----------------|-------------------------|-------------------------------------|
| <b>City</b>           | <b>Station</b> | <b>Number of Visits</b> | <b>Estimated Listening Audience</b> |
| Alton                 | WBGZ           | 4                       | 25,000                              |
| Atlanta               | WLCN           | 2                       | 10,000                              |
| Canton                | WBYS           | 4                       | 10,000                              |
| Centralia             | WILY           | 7                       | 10,000                              |
| Danville              | WDAN           | 7                       | 20,000                              |
| Dixon                 | WIXN           | 1                       | 5,000                               |
| Galesburg             | WGIL           | 3                       | 13,000                              |
| Greenville            | WGEL           | 4                       | 5,000                               |
| Jacksonville          | WLDS           | 5                       | 10,000                              |
| Kewanee               | WKEI           | 2                       | 15,000                              |
| Macomb                | WJEQ           | 2                       | 10,000                              |
| Monmouth              | WRAM           | 2                       | 10,000                              |
| Mt. Vernon            | WMIX           | 4                       | 15,000                              |
| Oglesby               | WLPO           | 1                       | 20,000                              |
| Princeton             | WZOE           | 1                       | 10,000                              |
| Quincy                | WTAD           | 4                       | 25,000                              |
| Taylorville           | WTIM           | 1                       | 5,000                               |
| Vandalia              | WPMB           | 1                       | 10,000                              |
| Watseka               | WGFA           | 1                       | 10,000                              |

The following page contains a chart that details the percentage of telephone calls received by the Ombudsman, by region, in 2008.

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### Calls Received by the Ombudsman (by Region)



## **Market Status**

## **5. Market Status, Government Actions, and Recommendations for Improvements to Health Insurance Regulation**

### **A. MARKET STATUS**

#### **1. Health Insurance Market Contraction**

##### **Insurance Companies Withdrawing from the Health Insurance Market**

The Illinois Health Insurance Portability and Accountability Act (HIPAA) of 1997 (P.A. 90-0030) requires that health insurance companies seeking to discontinue the sale of all health insurance products in the individual, small employer, and large employer markets must provide proper notification to the Illinois Division of Insurance (“Division”) and the insureds. Between 1997 and 2004, insurance companies terminated business in Illinois with increasing frequency. Since 2005, there has been little activity in this area. In 2008, one carrier exited the individual marketplace and one carrier withdrew from the small group marketplace. The exit of these carriers does not appear to have significantly impacted the availability and affordability of coverage offered in the individual, small group, or large group marketplace.

Whenever a health insurance company withdraws from the market, the Division and OCHI receive numerous calls from individuals whose health care coverage is disrupted. The Division explains how these transactions work and the applicable consumer protections. For individuals losing coverage, the Division identifies available options to ensure continued health coverage. A law enacted in 2005 (215 ILCS 97/40(a)(iii)) requires insurance companies leaving the individual health market to notify each affected individual of the individual’s option to purchase any other individual health benefit plan offered by any affiliate of the carrier. This notification must take place at least 180 days prior to the date of expiration of coverage. When the exiting carrier does not have any affiliates that must offer coverage, the only alternative for individuals losing coverage due to carrier withdrawal is to access the HIPAA alternative coverage available through the Illinois Comprehensive Health Insurance Plan (CHIP). For a more complete description of CHIP, please refer to Page 18 of this report.

Persons losing individual coverage enjoy few rights under HIPAA. For individuals who cannot obtain coverage in the Individual marketplace due to past or present medical conditions, options are limited to:

- applying for standard CHIP coverage, which entails re-imposition of pre-existing condition limitations;
- going without health coverage; or

- securing employment with an employer that offers group health insurance as a benefit.

## 2. Health Insurance Availability

### a. Uninsured

In August 2008, the U.S. Census Bureau released 2007 year-end statistics for the uninsured. According to the report, titled "Income, Poverty, and Health Insurance Coverage in the United States: 2007," the percentage of people without health insurance coverage decreased from 15.8% in 2006 to 15.3% in 2007. Although the national number has slightly improved, the state's average percentage of uninsured from 2005 through 2007 was estimated at 13.7%, up from 13.6% in the last report.

According to the report, the number of people with health coverage increased to 253.4 million in 2007 from 249.8 million in 2006. The number of people covered by private health insurance was not statistically different, while the number of people covered by government plans increased to 83.0 million, up from 80.3 million in 2006.

According to a U.S. Census Bureau Press Release dated August 28, 2008, the number of uninsured children declined from 8.7 million (11.7%) in 2006 to 8.1 million (11.0%) in 2007.

The October 2008 Kaiser Commission report titled "Medicaid and the Uninsured" states that the main reason for the decline of uninsured Americans, as reported by the U.S. Census Bureau, is substantial growth in public coverage through both Medicaid and Medicare. In Illinois, the All Kids Health Insurance Program was expanded by law on November 15, 2005. Under the expansion, children at any income level are eligible for healthcare benefits if they have been uninsured for extended periods of time or if they meet the criteria for certain exceptions. According to the July 2008 "All Kids Preliminary Report," All Kids now provides healthcare benefits to over 1.4 million children in Illinois. Enrollment in the All Kids program has grown by about 200,000 children since July 1, 2006.

The 2008 Kaiser Commission Report (discussed above) states that reductions in the number of uninsured are unlikely to continue due to the current economic turmoil and resulting unemployment. The report projects that the number of uninsured individuals will increase by at least two million in 2008; and the number will be higher if the unemployment rate increases beyond 6.1 percent.

**b. Underinsured**

Another disturbing trend is the growth of the underinsured population. The underinsured are commonly defined as individuals who are exposed to significant financial losses or are unable to obtain needed care because of inadequate health coverage.

In its June 2008 report titled “How Many Are Uninsured?,” the Commonwealth Fund found that as of 2007, 25 million insured people ages 19-64 were underinsured – a 60% increase since 2003. The rate of increase was steepest among those with incomes above 200% of poverty, where underinsurance rates nearly tripled. In total, the Commonwealth Fund found that 42% of U.S. adults were underinsured or uninsured in 2007.

This problem of underinsurance is not limited to low-income families. The underinsured rate for middle-income families with annual incomes of \$40,000 to \$59,000 reached double digits in 2007. The study reports that barely half of those with incomes between 200 and 299 percent of the poverty level were adequately insured for the entire year.

The 2007 Annual OCHI Report included information from a December 2007 Families USA study which reported that while underinsured rates have risen in every state since 2000, the growth in the Illinois underinsured population outpaced the growth found in two-thirds of country. The study, titled “Too Great a Burden: America’s Families at Risk,” estimated that in 2008, 21.9% of the Illinois population under 65 (2.5 million people, 2.06 million of whom have health insurance) would be in families that spend over 10% of their pre-tax income on health care. About 5.9% of the population under 65 (662,000 people, 508,000 of whom have health insurance), the study reported, would be in families that spend over 25% of their pre-tax income on health care.

**c. Employees Losing Group Health Coverage**

In 2008, OCHI continued to receive calls from employees losing their group health coverage and asking about continuation options. In 2008, OCHI received 2,039 calls regarding continuation of group health coverage.

Employees lose their health insurance coverage for a variety of reasons, including layoffs, business closings, and employer bankruptcy. A complete list of employer closing notifications by month can be viewed at

the Department of Commerce and Economic Opportunity (DCEO) website ([http://www.ildceo.net/dceo/Bureaus/Workforce\\_Development/WARN/](http://www.ildceo.net/dceo/Bureaus/Workforce_Development/WARN/)).

As reported in previous years, many employers no longer offer retiree health insurance coverage and have terminated coverage for current retirees. This trend continued in 2008.

To address this persistent and growing problem, the State created a Rapid Response Team which informs and educates the dislocated workers and retirees about services available to ease their transition. In 2008, the Rapid Response Team continued its work. Section 4 of this Report details the Uninsured Ombudsman Program's active membership on this team.

OCHI continues to provide information and coverage options to retirees losing coverage. OCHI works with SHIP to stay abreast of Medicare changes applicable to the retiree population. OCHI also educates individuals who may be eligible for relief under the federal Trade Adjustment Assistance Reform Act (TAA). TAA provides tax credits to certain workers and retirees who purchase health insurance after losing employer-sponsored health coverage due to increased imports or trade-related relocations.

**d. Illinois Comprehensive Health Insurance Plan**

The Illinois Comprehensive Health Insurance Plan (CHIP) (215 ILCS 105/1 *et seq.*) operates two pools. The Traditional CHIP (Section 7) pool is designed for individuals who are denied health insurance coverage in the conventional market because of past or present medical conditions. This pool is funded partially through state appropriations and partially through premiums. The coverage provided includes a six-month pre-existing condition limitation.

The HIPAA-CHIP (Section 15) pool is the state's mechanism to protect the portability rights of individuals who have satisfied HIPAA requirements (*e.g.*, prior creditable coverage in a group health plan). Effective June 23, 2003, HIPAA-CHIP was expanded to include the TAA-CHIP program. It became a qualified health plan pursuant to the Trade Act of 2002 for eligible persons, allowing participants to claim the Health Coverage Tax Credit (HCTC) equal to 65% of paid premium. HIPAA-CHIP by statute cannot impose pre-existing condition limitations. This pool is funded partially by health insurance industry assessments and partially by premiums.



On January 1, 2008, ICHIP began offering High Deductible Health Plan (HDHP) options that allow participants to take advantage of tax- favored Health Savings Accounts (HSA). As of the end of 2008, 854 participants had chosen this option. ICHIP continues to partner with other state and federal agencies to conduct outreach to employees who, for a variety of reasons, lose their employer-based health coverage.

Enrollment data for both the Traditional CHIP (Section 7) and HIPAA-CHIP (Section 15) pools can be found in the CHIP Annual Report. The CHIP Annual Report can be viewed at [www.chip.state.il.us](http://www.chip.state.il.us)

**e. Cost of Continuation Coverage/Shift of Cost of Care to Communities and Providers**

Loss of health insurance benefits can result from many events such as loss of a job, reduction in benefits by an employer, loss of dependent status due to divorce, death of employee, retirement of the employee, or other circumstances. Federal and state laws require employers to offer employees and dependents who lose coverage the right to continue coverage as a member of the group for specified time periods. The obstacle for most individuals is the cost of the coverage: those who elect to continue coverage must pay the full cost out of their own pockets. Unfortunately, for most people, continuation coverage is not affordable.

A January 2009 Families USA report titled "Squeezed! Caught between Unemployment Benefits and Health Care Costs," states that in November 2008, more than 10.3 million people were unemployed. Many of these unemployed people and their families lost health care coverage when they lost their jobs. According to the report, on a national level, the average single unemployed worker collecting unemployment insurance income would need to spend 30% of that income to purchase single-person COBRA or state continuation coverage. The national average for families is even more alarming -- family continuation coverage would consume nearly 84% of an individual's unemployment insurance income. In Illinois, family continuation coverage would consume, on average, more than 75% of the average individual's unemployment insurance income.

According to the report, the national average cost of employer-provided coverage for an individual (plus 2% administrative charge for the federal COBRA coverage), amounts to \$388 per month for an individual and \$1,069 per month for a family. COBRA or state continuation coverage is unaffordable for most laid-off workers.

OCHI and the Uninsured Ombudsman receive over 1,000 requests a year for information regarding resources available to the underinsured and

uninsured. Many of those individuals have lost employer-based group health insurance and are unable to afford continuation coverage or coverage available under the HIPAA-CHIP plan.

**f. Cost of Guaranteed Coverage Under HIPAA**

Federal and state HIPAA laws guarantee access to health coverage for individuals who lose their employer-sponsored group health coverage. Illinois residents who lose group health coverage are eligible for HIPAA-CHIP plan coverage. However, the individual must exhaust all coverage available under federal COBRA or state continuation laws before becoming eligible for HIPAA-CHIP. As discussed previously, federal COBRA and state continuation coverage is unaffordable for many Illinoisans. The high cost of continuation coverage, therefore, acts as a barrier to HIPAA-CHIP eligibility.

Those who qualify for the CHIP and HIPAA-CHIP plans find that the coverage is not inexpensive. For example, a single female age 20-29 in the Chicago area applying for HIPAA CHIP's \$1,000 deductible plan can expect to pay \$387 per month. A single male age 50-54 in the Chicago area can expect to pay \$793 per month for the same coverage. A male child between ages 0-19 in the same geographical area would be charged \$241 per month for the same coverage.

### 3. Trends

#### a. PPO Plans Low Reimbursement for Non-Contracted Providers

PPO plans pay the optimum benefit to the insured when the insured utilizes a preferred provider. The PPO plan allows the insured flexibility to use non-participating providers; however, exercising this flexibility is increasingly very costly to consumers. Many PPOs pay for those services based upon “usual and customary” rates, a methodology that is supposed to reflect the prevailing market rate for a doctor visit or medical service in a given geographic area. Reimbursement amounts based upon usual and customary rates have fallen drastically in the last several years. An investigation of one health claims consultant is currently underway to determine if information was manipulated to arrive at artificially low rates. This particular consultant is routinely used by large insurance companies throughout the nation.

Some plans are paying non-participating providers based upon the negotiated rate that would have been paid to a participating provider. For example, suppose a PPO policy pays 70% of non-participating surgeon charges and the insured incurs a bill for \$5,000 from a non-participating surgeon. A preferred provider has agreed to a contractual rate of \$2,000 for the service in question. Using the contracted or negotiated rate as a basis for payment, the insurer will pay 70% of \$2,000 (\$1,400) for the surgery. The insured will incur out-of-pocket expenses in the amount of \$600.00 for the 30% copayment and another \$3,000 for the amount charged by the non-participating surgeon over the contracted rate. Note that the \$3,000 does not accrue to the insured’s out-of-pocket maximum on the policy.

Another fee methodology being used by some insurance companies is payment for non-participating provider claims based on a percentage (e.g., 200%) of the Medicare published rate for the same or similar service. Because Medicare claim reimbursement rates are relatively low rates established by the federal government, this methodology can result in very low reimbursement of non-participating provider claims. This again leaves insureds vulnerable to unexpected and costly bills for medical services.

The Division is experiencing increased complaints regarding the methodologies used by PPO plans to pay non-participating providers. The plans are required by law (215 ILCS 5/356z.2) to prominently disclose in the policy that limited benefits are available when using non-

participating providers; however, the consumer is genuinely surprised by the low payments made by these plans.

**b. Discount Health Care Plans**

Illinois currently has approximately 155 registered Preferred Provider Administrators (PPAs) operating in the state of Illinois. Approximately half of these entities report offering health care services on a discounted basis. While the number of PPAs registered with the Division of Insurance continues to increase, so has the unprecedented increase in unauthorized discount health care plans. Illinois residents are being repeatedly exposed to fax blasting, multimedia presentations, and internet solicitations for enrollment into discounted health care programs which promise access to a wide array of health care services and supplies at reduced prices. Routinely, these plans offer discounted rates for medical, surgical, hospital, dental, vision, prescription drug, emergency travel, mental health, and substance abuse care.

Many employers view discount health care programs as cost effective alternatives to offering supplemental insurance coverage to their employees. Individuals often see these types of plans as an alternative to costly private coverage. Many discounted health care programs provide legitimate and useful discounts, but others provide only minimal coverage through marginal or non-existent provider networks, and at a great profit margin for the program sponsors. The Division has found that in many instances, the “discounts” Illinois consumers pay for are unavailable because the purported contractual relationship between the discount program and the health care provider does not exist. In such cases, consumers are out-of-pocket for the cost of the discount program and suffer additional financial loss when they are denied access to promised reductions in the cost of health care services, supplies and pharmaceuticals.

Although there are exceptions, Illinois law generally requires discount plans to be registered as preferred provider administrators under the Health Care Reimbursement Act (Article XX ½ of the Insurance Code, 215 ILCS 5/370f). The Division continues to actively work to register these plans as preferred provider administrators. Unfortunately, other states often lack oversight authority of discount plans, leading plan sponsors to believe they do not have to register under the Illinois law. This belief may be further reinforced by unrelated state mandates requiring discount programs to disclose on their membership cards that the marketed discount program is “not insurance.” While it is true that a preferred provider administrator is not an insurance company, it is still required to be registered with the Division.

The Division continues to address this issue, and encourages the consumer to verify that the discount program is authorized to conduct business in Illinois before purchasing the product. A listing of authorized preferred provider program networks has been placed on the Division's website <http://www.idfpr.com/DOI/PPA/PPAlist.asp>.

**c. PPO Plans Accessing Inappropriate Provider Discounts**

The Division continued to receive complaints in 2008 regarding PPO Plans that either accessed discounts to which they were not entitled or accessed discounts through networks other than those approved by the Director (all networks approved by the Director are published on the Division's PPO Provider Network website). In both cases, plans inappropriately accessed health care provider discounts. This type of plan behavior is harmful to the consumer, whose health care dollars pay for a nonexistent health care delivery system or one whose repricing only benefits the plan, not the member. For the provider, an inappropriate discount plan may access discounts of which the provider has not been given proper notice, nor provided contractual consent. The Division continues to address this issue and actively works with state agencies to protect consumers.

**d. Non-Directed Provider Networks By Indemnity Plans**

As the insurance industry struggles to contain certain kinds of escalating health care costs, it has placed particular focus on health care provider reimbursements. For example, plans have begun to use contractual relationships with providers to re-price claims submitted through indemnity contracts.

The concept of discounting provider services and passing savings on to the consumer is not new. Traditionally, these arrangements have been known as Preferred Provider Organizations (PPO). PPO products combine insurance coverage with contracted provider networks, providing the insured with cost savings generated through these arrangements. What is new is that insurance companies now apply these same discounts to non-PPO products.

The Illinois General Assembly passed legislation in the late 1980's which established guidelines and consumer protections for PPO products. Insurance companies are now issuing indemnity contracts which do not contain these safeguards and do not disclose benefit differentials for using contracted versus non-contracted providers. The insurer will simply

reprice claims to known discount levels when the insured uses a provider contracted with the insurer. In these cases, the consumer may or may not receive the benefit of such discounts.

This approach has also raised concerns within the provider community. Providers argue that insurance companies may not reprice claims or take discounts unless the insured is provided contractual incentives to use participating providers.

The re-pricing of claims through non-directed provider networks has left consumers struggling with collection activities initiated by providers who believe that their fees have been unfairly and extra-contractually reduced.

**e. High Deductible Health Plans – Health Savings Accounts**

The rising cost of health insurance benefits is causing employers to search for new, lower-premium coverage options that still provide quality health benefits to employees. One such option is the High Deductible Health Plan (HDHP), which is a catastrophic insurance plan often combined with a health care spending account such as a Health Reimbursement Arrangement (HRA) or Health Savings Account (HSA).

The use of HSAs appears to be increasing in the Illinois marketplace. The Medicare Prescription Drug, Improvement and Modernization Act of 2003 (MMA) (P.L. 108-173) added Section 223 to the Internal Revenue Code, which established HSAs as an alternative benefit design. An HSA is a tax-exempt trust established exclusively to pay for qualified medical expenses of the account beneficiary who is covered under a high-deductible health plan. Employers and employees may contribute to the HSA account.

Money stored in the account may be used to cover permitted first-dollar benefits (*e.g.*, preventive care) and to satisfy the high deductible associated with the catastrophic insurance policy. Any money in the account at the end of the contract year carries over to the next year and is the employee's to keep, even upon retirement. Proponents of HDHPs believe HSAs provide more flexibility and discretion to the consumer over the utilization of health care benefits.

HRA accounts resemble HSAs. Under an HRA, the employee is prohibited from contributing to the account by Internal Revenue Service ("IRS") rules; only the employer may contribute. Also, an individual with Medicare or other health coverage may enroll in a HRA account but may

not enroll in a HSA account. If the individual becomes eligible for Medicare or other health coverage after enrolling in a HSA account, that individual may no longer contribute to the HSA account.

The Kaiser Family Foundation 2008 Employer Health Benefits Survey (<http://ehbs.kff.org/images/abstract/7791.pdf>) found no significant increase from 2007 to 2008 of the percentage (10%) of firms offering health benefits through high deductible health plans with savings options. However, there has been a significant increase in these plans since 2006 (from 7% to 10%), especially among firms with 1,000 or more workers.

The growth of HDHPs has brought with it growth in the underinsured population. Individuals and employees with significant financial resources sometimes prefer the financial flexibility offered by HDHPs; they pay lower premiums to the insurance company in exchange for managing and paying for health care costs below their high deductible. Many Illinoisans, however, enroll in HDHPs not as a result of a sophisticated financial decision but because it is either the only individual market plan they can afford or because it is the only plan sponsored by their employer. These individuals, often underinsured, delay or struggle to pay for necessary medical care. See Page 17 of this report for more information about the underinsured.

#### **f. Cost Shifting to Employees**

As the cost of employer-sponsored group health insurance continues to rise, employers continue to search for lower-cost alternatives. Costs of health care coverage are being shifted to employees through: 1) increased percent-of-premium contribution; 2) increased deductibles and copayments; 3) copayments being calculated as a percent of charges instead of flat dollar amounts; and 4) limiting prescription drug benefits.

According to the Kaiser Family Foundation Employer Health Benefits 2008 Survey, (<http://ehbs.kff.org/images/abstract/7791.pdf>), about 80% of workers with single coverage and 93% of workers with family coverage contribute to the total premium for their coverage. From 2007 to 2008, workers with PPO coverage with a deductible saw that deductible rise, on average, from \$461 to \$560 for single coverage and from \$1,040 to \$1,344 for workers with an aggregate deductible for family coverage. The survey reports that the percentage of covered workers in a plan with a deductible of at least \$1,000 for single coverage has grown from 10% to 18% over the last two years. For small firms, that percentage has increased from 16% to 35%.

The Division has identified a clear trend of increasing copayments for all services, including office visits, emergency room visits, inpatient hospital visits and prescription drugs. The increased copayments can be attributed to the increased cost of these services as well as the employee being held accountable for a portion of the medical services received.



## **Government Actions**

## B. GOVERNMENT ACTIONS

### 1. Federal

#### a. Medicare Improvements for Patients and Providers Act (MIPPA)

The Medicare Improvements for Patients and Providers Act (MIPPA), which became law in July 2008, made a number of changes to the Medicare Advantage (MA) and Medicare prescription drug benefit programs. Federal CMS issued final and interim regulations which clarify existing law and provide guidance to Medicare beneficiaries seeking to protect themselves from deceptive or high-pressure marketing tactics by private insurance companies and their agents/brokers.

The regulations detail measures to prevent, detect, and respond to insurance agent misconduct. Examples of these measures include:

- Creation by federal CMS of an organization-wide task force responsible for overseeing and responding to agent and broker complaints.
- Creation of an oversight team responsible for monitoring insurance agent behavior based on certain statistics (*e.g.*, high enrollment cancellation rates connected to a particular agent or broker).
- Implementation by federal CMS of an internal secret shopping program.
- Development of special policies and procedures to prevent particularly vulnerable beneficiaries (*e.g.*, individuals residing in group homes) from being inappropriately targeted by aggressive marketing agents.
- Imposition of strong corrective actions against unscrupulous agents and brokers as a means of deterrence.

The regulations also provide for specific Medicare marketing prohibitions, including:

Plans may offer gifts to potential enrollees only if such gifts are of nominal value (*i.e.*, a value of \$15 or less based on the retail purchase price of the item) and provided regardless of whether the individual enrolls in the plan.

- Plans and any person the plan contracts with to solicit sales are prohibited from using door-to-door solicitations and other unsolicited sales tactics that occur outside of advertised sales or educational events.

- Strict new guidelines govern situations where plan representatives are allowed to make outbound calls to consumers (e.g., scripts for calls must be reviewed and approved prior to use, and must include a clear privacy statement).
- Plan marketing representatives must clearly identify the types of products that will be discussed before marketing to a potential enrollee.
- Prior to a plan marketing representative meeting a consumer by appointment, the consumer must agree to the scope of the appointment and that agreement must be documented or recorded by the plan.
- Plans may not conduct sales activities in healthcare settings, except in common areas.
- Educational events may not include sales activities, such as the distribution of marketing materials or distribution or collection of plan applications.
- Plans are prohibited from using names and logos of co-branded network partners (e.g., Walmart and Humana) on membership plan identification cards.

**b. Mental Health Parity Reauthorization Act**

On October 3, 2008, Congress passed new federal mental health parity legislation (HR1424) that amends the previous law. Effective October 3, 2009, group health plans of 50 or more employees (including self-insured employer plans) that cover mental health or substance abuse treatment must provide those benefits with the same cost-sharing and treatment limitations applicable to physical illness. (For plans that are maintained pursuant to a collective bargaining agreement, the amendments apply for plan years beginning when the collective bargaining agreement expires or January 1, 2010, whichever is later.) The federal law does not apply to employer groups with 50 or fewer employees.

The amendments require insurance companies and employers that offer coverage for mental health services to apply cost sharing requirements (deductibles, co-payments, coinsurance) and treatment limitations (limitations on the frequency of treatment, number of visits, etc.) to mental health services that are no more restrictive than the predominant financial and treatment limitations applied to substantially all medical and surgical benefits covered by the policy.

The Illinois mental health parity law (215 ILCS 5/370c), also known as the “Serious Mental Illness Mandate,” requires group insurance policies covering more than 50 employees and all group HMO contracts to both:

1) cover serious mental illnesses (not substance abuse disorders); and 2) provide parity with respect to that coverage. The new federal parity law does not replace Illinois mental health parity. Instead, federal and Illinois parity laws will be harmonized by preserving the features of each law that best protect consumers.

**c. Genetic Information Nondiscrimination Act (GINA)**

The Genetic Information Nondiscrimination Act (GINA) (H.R. 493) was signed by President Bush on May 21, 2008. The provisions of GINA apply to individual and group health plans. For group health plans and health issuers, the law is effective for plan years beginning after May 21, 2009. The law is effective against individual health insurance policies sold, issued, renewed, in effect, or operated in the individual market after May 21, 2009. For GINA to apply to Medicare Supplement coverage, states must appropriately amend their regulations no later than July 1, 2009.

GINA prohibits insurance companies in the group marketplace from using genetic information to adjust premium or contribution amounts. In the individual marketplace, the Act prohibits insurance companies from using genetic information to deny coverage, determine premium rates, or impose pre-existing condition exclusions. In the Medicare Supplement marketplace, insurance companies will be prohibited from using genetic information to deny or condition coverage, to determine premium rates, or to impose pre-existing condition exclusions. GINA's prohibitions against the use of genetic information do not prevent insurance companies from using information about a manifestation of a disease or disorder, even if genetically based.

GINA also prohibits group health plans and health issuers from requesting or requiring an individual or family member of an individual to undergo a genetic test.

**d. Michelle's Law**

"Michelle's Law" (H.R. 2851) was signed into law on October 9, 2008. This federal law is effective for all insured and self-funded health plans on the first day of plan years beginning on or after October 9, 2009. Under the law, dependent children who are full-time students at a post-secondary educational institution are allowed to extend eligibility as a dependent child under a group health plan for up to one year during a medically necessary leave of absence from school due to a serious medical condition.

## **2. State - Public Acts**

(Full text of the Public Acts may be viewed at [www.ilga.gov](http://www.ilga.gov).)

### **a. P.A. 95-0978 Shingles Vaccine**

Public Act 95-0978 (House Bill 4602) amends the State Employees Insurance Act of 1971, the Counties Code, the Illinois Municipal Code, the School Code, the Illinois Insurance Code, the HMO Act, and the Voluntary Health Services Act to provide coverage for a federally approved shingles vaccine for enrollees 60 years of age or older when ordered by a physician licensed to practice medicine in all its branches.

The law does not designate a benefit level.

The law became effective for group and individual policies amended, delivered, issued or renewed after the effective date of January 1, 2009.

### **b. P.A. 95-973 Eating Disorders**

Public Act 95-973 (House Bill 1432) amends the State Employees Insurance Act of 1971, the Counties Code, the Illinois Municipal Code, the School Code, the Illinois Insurance Code, the HMO Act, and the Voluntary Health Services Act. Specifically, the law amends 215 ILCS 5/370c to include both “anorexia nervosa” and “bulimia nervosa” in the list of serious mental illnesses subject to certain coverage requirements.

The law applies to group policies covering more than 50 employees issued or renewed after the effective date of January 1, 2009.

### **c. P.A. 95-0972 Coverage for Marriage and Family Therapists**

Public Act 95-0972 (House Bill 0953) amends the State Employees Insurance Act of 1971, the Counties Code, the Illinois Municipal Code, the School Code, the Illinois Insurance Code, the HMO Act, and the Voluntary Health Services Act. Specifically, the law amends 215 ILCS 5/370c to require coverage of services provided by licensed marriage and family therapists.

The law became effective on September 25, 2008.

**d. P.A. 95-0958 Dependent Coverage**

Public Act 95-0958 (House Bill 5285) amends the State Employees Insurance Act of 1971, the Counties Code, the Illinois Municipal Code, the School Code, the Illinois Insurance Code, the HMO Act, and the Voluntary Health Services Act. The new law (215 ILCS 5/356z.12) gives parents with insurance policies that cover dependents the right to elect coverage for qualifying dependents up to age 26 and up to age 30 for military veteran dependents.

The law will be effective beginning June 1, 2009. Any individual or group insurance policy issued, delivered or renewed on or after that date must include coverage required by the new law. A fact sheet regarding the new law is available at

<http://www.idfpr.com/DOI/pressRelease/pr08/HB5285DependentCoverage.pdf>.

**e. P.A. 95-1005 Autism spectrum disorders**

Public Act 95-1005 (Senate Bill 0934) amends the State Employees Insurance Act of 1971, the Counties Code, the Illinois Municipal Code, the School Code, the Illinois Insurance Code, the HMO Act, and the Voluntary Health Services Act. The new law provides individuals under 21 years of age coverage for the diagnosis and treatment for autism spectrum disorders. The law provides that the coverage shall be subject to a maximum benefit of \$36,000 per year.

The law became effective on December 12, 2008. A fact sheet regarding the new law is available at

<http://www.idfpr.com/DOI/pressRelease/pr08/AutismFactSheet.pdf>.

**3. Other State Actions - Division Regulations**

**a. 50 IAC 2018 Long Term Care Partnership Program (Repealed)**

This Rule, which contained requirements under the first Long Term Partnership, was repealed. Provisions for the new Long Term Partnership were incorporated into Part 1012 of Title 50 of the Illinois Administrative Code (50 Ill. Admin. Code 1012).

**b. 50 IAC 2012 Long Term Care Insurance**

This Rule was revised to comply with the Federal Deficit Reduction Act of 2005. The changes are necessary before long term care partnership policies can be offered in Illinois. However, long term care policies cannot be approved by the Division until the Illinois Department of Healthcare and Family Services submits a state Medicaid Plan amendment to the federal government. Once those additional amendments are approved, the Division will be able to approve long term care partnership policies.

**c. 50 IAC 2025 Illinois Health Insurance Portability and Accountability Standards (HIPAA)**

This Regulation was amended to address provisions contained in Section 20(E)(3) of the Illinois Health Insurance Portability and Accountability Act (215ILCS97/20(E)(3)) which requires the Division to establish rules to prevent an insurance carrier's failure to provide information about an individual's previous benefits from adversely affecting the subsequent coverage under another group plan.

**4. Other State Actions – Company Bulletins**

**a. Company Bulletin #2008-02 – Medicare Supplement Under 65 Disabled**

Public Act 095-0436 (SB 0873), effective June 1, 2008, requires all companies writing Medicare Supplement insurance in Illinois to guarantee the issuance of all Medicare supplement policies offered in Illinois to persons under the age of 65 who become eligible for Medicare by reason of disability.

Company Bulletin #2008-02, issued by Director McRaith on April 2, 2008, advised insurance companies that rate filings for Medicare Supplement policies to be marketed to the under-age-65 disabled population must be filed prior to June 1, 2008 in order to ensure company compliance.

**b. Company Bulletin #2008-03 – Medicare Supplement Under 65  
Disabled - Commissions**

Issued by Director McRaith on June 24, 2008, Company Bulletin #2008-03 advises insurance companies that the reduction or limitation of agent commissions on the sale of Medicare Supplement policies to the under-age-65 disabled population is a violation of Sections 363(6)(b) (215 ILCS 5/363(6)(b)) and 364 (215 ILCS 5/364) of the Illinois Insurance Code.

**c. Company Bulletin 2008-04 - Exceptions for Consumers in Disaster Areas**

Company Bulletin 2008-04 was issued by Director McRaith on June 17, 2008. The bulletin directed all insurance companies to implement extensions for premium payments to all policyholders affected by the flooding throughout the state. The bulletin also imposed a moratorium on cancellation or nonrenewal; a required time period extension for repairs; directions to insurance companies to post information on their websites; special instructions regarding Medicare beneficiaries; and a requirement that insurance companies notify consumers with a disaster-related complaint or issue about the availability of the Division.



## **Recommendations to Improve Health Insurance Regulation**

## C. RECOMMENDATIONS TO IMPROVE HEALTH INSURANCE REGULATION

### 1. Denials of Coverage and Affordability of Coverage in the Individual Market

Illinois law does not prohibit insurance companies from using the age and health status of individuals and their families to deny or rate individual market health coverage. The health status information used to price premiums and support coverage denials is usually found by insurance companies in an individual's health insurance application and/or medical records. Current Illinois law does not prohibit insurance companies from using any past or present medical condition, no matter its severity or how long ago resolved, to support an unaffordable offer of coverage or coverage denial: a 12-year-old child can be rejected or charged a much higher premium because of a repaired birth defect with no present-day health effects; a 22-year-old woman can be rejected or charged a much higher premium based on asthma; a 28-year-old man can be rejected or charged a much higher premium based on an allergy; a 34-year old man can be rejected or charged a much higher premium because, ten years ago, he sought treatment from a psychiatrist after the death of his father; a 49-year-old woman can be rejected or charged a much higher premium based on breast cancer that has been in remission for more than a decade; a 54-year old man can be rejected or charged a much higher premium because his doctor noticed early signs of arthritis.

State law neither requires nor prohibits insurance companies from pricing or denying individual market coverage because of minor or long-ago resolved medical conditions. State law does not require that insurance companies maximize shareholder or company profits. State law does, however, require that insurance companies meet minimum solvency requirements. Illinois insurer solvency laws require insurance companies to charge higher premiums to individuals who in actuarial terms are more likely to incur high medical costs. Not all individuals who are denied or priced out of coverage have minor or long-ago resolved conditions – some people at the time of application do, in fact, suffer from or are likely to soon suffer from major illnesses which require very expensive treatment (*e.g.*, cancer, heart disease). Because state law requires insurers to maintain adequate financial reserves for the risks they assume, current law requires insurers to charge higher rates for higher risk (sicker) individuals.

In addition to the solvency problem, an insurer may also face marketplace or competition problems if, under current state law, it stopped denying coverage or risk-pricing altogether. If Insurer X stops denying coverage and pricing

coverage based on age and health status in a state that allows Insurer X's competitors to issue age and health-related coverage denials and premium offers, Insurer X would soon find itself as the "insurer of last resort" for high-risk and high-cost individuals. Soon, Insurer X would find itself paying more and more claims and would be forced to raise premiums. Higher premiums would cause lower-cost, lower-risk individuals (at least in actuarial terms) to seek coverage elsewhere, leaving Insurer X with an even greater concentration of higher-cost, higher-risk enrollees. Premiums would continue to increase along with claims, leading to skyrocketing rates (*i.e.*, the so-called "death spiral").

Individuals and families who receive affordable offers of individual market coverage can face unaffordable premium increases upon renewal. State law does place limited restrictions on the methods used to calculate annual premium increases, but it does not restrict the amount of increase. For example, if an insurance company wants to close an unprofitable block of business, it can annually impose dramatic, actuarially-based premium increases on remaining policyholders, causing healthy consumers to choose other products and forcing less healthy or older consumers to pay more for or drop the now unaffordable coverage. Less healthy or older consumers who lose the coverage may be denied conventional market coverage for the rest of their lives.

The state's high risk pool, also known as the state Comprehensive Health Insurance Plan ("CHIP"), does not provide an affordable alternative. For instance, a 55-year-old man who has been denied coverage by an insurance company qualifies for the Traditional (Section 7) CHIP pool. If he lives in Chicago, his monthly CHIP premium for a PPO product with a \$500 annual deductible would be \$1,172 (less expensive CHIP premiums are available, but require the imposition of a higher deductible). A 35-year-old woman living in Lincoln, Illinois (county seat of Logan County, located in southern Illinois) purchasing the same coverage would pay less, but would still owe \$445 per month (less expensive CHIP premiums are available, but require the imposition of a higher deductible).

Illinois must modernize its health insurance marketplace. The legal foundation of Illinois' current approach to individual market regulation was built in the early 1970s. The health coverage struggles facing sole proprietors, employees, and small and large businesses have changed dramatically in the last four decades. For instance, the percentage of employers offering health coverage has decreased significantly, leaving more Illinoisans looking to purchase individual or family coverage in the individual market. The last thirty years has also produced a dramatic increase in the number of individuals who work for a company on a contract basis rather

than as an employee. Left without employer-sponsored coverage, these individual contractors and their families also seek coverage in the individual market. Unfortunately, the growing number of individuals and families looking for individual coverage in Illinois will encounter a dysfunctional individual market, as market forces created by current state law and insurance company profit pressures make it difficult for many Illinoisans and their families to purchase affordable coverage.

**POSSIBLE REMEDY:** Ensuring that all Illinoisans, regardless of present or past medical conditions, have access to affordable individual market coverage is a complex and difficult task that requires reforming not just insurance laws, but the health care delivery system itself. For example, all experts agree health insurance reforms would be complemented by simultaneous and systematic efforts to reduce health care costs. Nonetheless, to restore basic fairness, reform of Illinois laws governing the individual marketplace should focus on reducing “adverse selection” (*i.e.*, encouraging individuals to purchase insurance before they become sick) and spreading risks across larger pools of insured lives.

## **2. Affordability of Coverage in the Small Group Market**

State laws governing small group (*i.e.*, small businesses with 2-50 employees) health coverage differ from the state laws governing individual market health coverage in two key respects. First, while individuals can be denied coverage in the individual market, state and federal law requires small group carriers to offer coverage to small businesses. Second, while state law does not regulate premiums for individual market products, it does use rate bands to restrict premium variation for small businesses.

While guarantee issue and premium variation restrictions brought some stability to the small group market, small businesses still struggle to find affordable coverage for their employees. Some small businesses simply cannot afford to provide coverage based on the available offers. Other small businesses provide coverage only to find that premium increases upon renewal are not only unpredictable (making it hard to budget for health care expenses) but are sometimes unaffordable.

How can a small business whose coverage is guaranteed and whose premiums are restricted be faced with unaffordable and unpredictable premiums? The answer, again, is found by examining current state law. For example, consider a small business in rural Illinois that decides to offer its 11 employees health coverage. The employer, hoping to keep and attract skilled employees and believing that state law protects him against dramatic premium increases upon renewal, decides to provide coverage based upon first-year premiums offered by an insurance company. Premiums rise by

12% in the second and third year; a steep rise, but the employer continues to pay. However, for the fourth year, the small business owner, who has been struggling to pay expensive premiums for three years, is asked to pay an additional 40%. The insurance company explains that the increase is due to rising medical costs, claims submitted by the employees, and the increased average age of the employees. The employer must either pay the premiums or lose the coverage.

Like current state law governing the individual market, current state law governing small group insurance does place some marketplace pressure on companies to increase rates on small businesses with employees who, in actuarial terms, are likely to incur high medical costs. Again, a hypothetical example helps demonstrate this rating pressure.

If Small Group Insurer Y prices coverage below what is actuarially justified and within the rating limits imposed by the state's Small Employer Health Insurance Rating Act (215 ILCS 93/1 et seq.), the company would, because of its relatively low rates, become the insurer of choice for small businesses with higher-cost, higher-risk employees. Soon, Small Group Insurer Y would find itself paying more and more claims and would be forced to raise premiums. Higher premiums would cause small businesses with lower-cost, lower-risk employees to seek coverage from an insurance company that employed actuarially based pricing, leaving Small Group Insurer Y with an even greater concentration of higher-cost, higher-risk enrollees. Premiums would continue to increase along with claims, leading to skyrocketing rates (*i.e.*, the so-called "death spiral").

**POSSIBLE REMEDY:** Ensuring that all Illinois small businesses have access to affordable coverage is a complex and difficult task that requires reforming not insurance laws, but the health care delivery system itself. For example, all experts agree health insurance reforms would be complemented by simultaneous and systematic efforts to reduce health care costs. Nonetheless, to restore basic fairness, reform of Illinois laws governing the small group marketplace should focus on further reducing rate variation between small businesses and prevent skyrocketing premium increases upon renewal.

### **3. Health Insurance Company Premium, Loss, and Enrollment Data**

Unlike many other states, Illinois does not require health insurance companies to report basic premium, loss, and enrollment data. Such data is needed for two main reasons. First, premium, loss, and enrollment data is needed so that consumers can evaluate the value provided by different health insurance products. Some companies may spend a higher percentage of premium dollars on administrative costs and others may

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deliver more premium dollars to shareholders – consumers need this information to make rational marketplace choices. Second, with this data policymakers will have access to meaningful facts about the overall health insurance marketplace. These facts will inform public debates about reforming state health insurance regulation.

**POSSIBLE REMEDY:** The Division will continue to take measures that increase the availability of health insurance marketplace data critical to proper regulation and public policy development.

#### **4. External Independent Review**

Illinois law does not require insurance companies to provide consumers an external independent review when the company refuses to pay a claim based on an alleged lack of medical necessity. The insurance company determines medical necessity, including whether or not a treatment is experimental. The Division does not have the medical expertise to adjudicate individual disputes regarding medical necessity. Often, the remedy for the consumer is to pursue the matter through the courts, which is costly and time consuming.

**POSSIBLE REMEDY:** Amend the Insurance Code to require group and individual accident and health and disability policies to include an appeals procedure and an external independent review procedure for any procedures, services or treatments that have been denied as not medically necessary.

#### **5. Emergency Care Reimbursement**

Currently 215 ILCS 5/370(o) requires PPO policies to pay for emergency claims incurred at non-preferred providers at the same benefit level as it would have paid to a preferred provider. Many times the insured incurs a much larger out-of-pocket expense under the terms of the law because insurance companies pay emergency care claims based on usual and customary fee schedules (schedules that provide less generous provider reimbursements than in the past) and non-preferred providers “balance bill,” *i.e.*, bill insureds for the difference between the actual charges and the usual and customary fees paid by the insurer.

**POSSIBLE REMEDY:** Amend the PPA Regulation (50 Ill. Admin. Code 2051) to require that out of pocket costs incurred by an insured or enrollee who receives emergency care from an out-of-network provider will be no greater than if treatment had been rendered by a preferred provider.

## **6. Notification of HIPAA-CHIP**

Currently when an employer terminates and does not replace its group health plan, or when COBRA or State Continuation rights have been exhausted, there is usually no notice sent to the affected individual regarding Section 15 HIPAA-CHIP. This Section provides coverage to individuals who have lost group coverage, exhausted continuation coverage and are uninsurable on the open market due to health conditions. Section 15 HIPAA-CHIP does not impose a waiting period or pre-existing condition limitation. Under Section 15 HIPAA-CHIP, an Eligibility and Enrollment Form must be received by the CHIP Board Office within 90 days after the termination of coverage. The 90-day time limit is problematic for individuals who, unaware of Section 15 HIPAA-CHIP, shop the individual market for coverage only to find that insurance companies deny them coverage or offer only unaffordable coverage. Ninety days may have passed by the time these individuals find out about Section 15 HIPAA-CHIP coverage, making them ineligible. While insurance companies are required to notify individuals about CHIP in any declination of coverage letter, this notice often arrives too late.

**POSSIBLE REMEDY:** Mandate that insurance companies and employers notify employees of the availability of the Section 15 HIPAA-CHIP plan when an employer terminates group coverage without replacement coverage. Notice should be provided prior to exhaustion of benefits under federal COBRA or state continuation laws.

## **7. State Continuation Law – Anticipation of Divorce**

The state spousal continuation law (215 ILCS 367.2) requires that continuation of group coverage be offered to the spouse of a covered employee upon legal judgment for dissolution of the marriage. In many instances, the covered employee removes the spouse from the insurance prior to the legal judgment for dissolution of the marriage. This action prevents the spouse from taking advantage of the right to elect coverage under the state spousal continuation law. Federal COBRA law protects spouses under these circumstances whereas state continuation does not.

**POSSIBLE REMEDY:** Amend the Insurance Code to mirror federal COBRA requirements.

## **8. State Continuation Laws – Lack of Employer Cooperation**

The state continuation laws require certain action by employers to ensure affected individuals are provided health insurance continuation rights. For example, the state continuation law (215 ILCS 5/367e) requires employers to

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notify employees of health insurance state continuation rights upon termination of the employee's employment. The spousal continuation law (215 ILCS 5/367.2) requires that the spouse notify the employer or the insurance company of the request for continuation. The dependent continuation law (215 ILCS 5/367.2-5) requires the dependent or the responsible adult to notify the employer or the insurer of the request for continuation. In some instances, the employer refuses to cooperate. The Division does not possess regulatory authority over the employer and, in some instances, the insurance company will not assist the Division or consumer, *i.e.* the insurance company will not contact the employer to reaffirm the employer's responsibility to offer continuation. The problem is further exacerbated when an application is made to HIPAA-CHIP and coverage is denied because the employee, spouse, or dependent did not exhaust his or her continuation rights, as required.

**POSSIBLE REMEDY:** Amend the continuation laws to require the insurance company to notify terminated employees of their continuation rights when the employer is not cooperative.

#### **9. State Continuation Laws – Lack of Standardized Form**

The Division routinely receives requests from employers for a standardized form to use when providing employees notification of their state continuation rights. Many insurance companies do not provide a form to the employer and no standardized form is required by law.

**POSSIBLE REMEDY:** Adopt a regulation that provides a standardized form for employer-to-employee notification of state continuation rights.

#### **10. Insurer Audits of Paid Claims**

In 2008, the Division continued to receive numerous complaints from providers and insureds regarding recovery practices by insurance companies and HMOs. A law passed in 2004 provided guidelines for insurance companies to use when recouping payments. Unfortunately, this law (215 ILCS 5/368d) did not stipulate any time frame within which the recoupment must be made. Many times insurance companies request recoupment for claims that are over two years old. While the Division does not dispute the company's right to recover monies that have been paid in error, a reasonable time limit should be imposed. The Division has received complaints wherein the claims being recovered are so old that the provider no longer has current patient records and cannot locate the patient to recover the money.



**POSSIBLE REMEDY:** The current law (215 ILCS 5/368d) should be amended to require a specific time frame (e.g., 2 years) within which a recoupment may be requested.

## 11. Pre-certification of services

- a. Calls and complaints from consumers regarding pre-certification of services followed by claim denials are steadily increasing. “Pre-certification” requires that the consumer or health care provider call the insurance company in advance of a service and receive a certification of coverage. Some plans provide consumers this pre-certification and then deny the claim due to lack of medical necessity, a pre-existing condition limitation, or lack of coverage under the policy. This action leaves the consumer and health care provider liable for the service.

**Possible Remedy:** Enact legislation that requires insurance companies to review the insured’s individual membership file before pre-certifying benefits. In addition, insurance companies should be required to specifically advise individuals if pre-certified benefits may not be reimbursed due to: 1) a pre-existing condition limitation; 2) lack of medical necessity 3) failure to pay premiums at the time of pre-certification; or 4) an exclusionary rider.

- b. The Division has received an increasing number of calls and complaints from consumers who call insurance companies to pre-certify services and are not advised of important benefit limitations. Consumers are not told that their provider is not a PPO provider and/or that the policy pays limited benefits when consumers choose non-preferred providers. For example, the plan may tell the consumer it pays 80% of non-preferred provider charges, but the plan does not disclose that the 80% benefit is based on a very low reimbursement rate (sometimes it is 80% of what a preferred provider charges the plan). The consumer believes the 80% benefit is based on billed charges or usual and customary fees.

**Possible Remedy:** Require insurance companies to inform the consumer or health care provider of the preferred or non-preferred status of the provider when a consumer calls to pre-certify services. Require the insurer to verbally advise the caller of benefit limitations that must be disclosed pursuant to 215 ILCS 5/356z.2. Also, require insurance companies to explain to callers the ramifications of seeking services outside the PPO network so the caller is well informed about the financial consequences of visiting preferred and non-preferred providers.

## 12. Disclosure of products being sold to consumers.

Consumers looking for affordable individual market major medical health insurance policies are unknowingly purchasing limited benefit policies such as a Basic Hospital/Medical-Surgical Expense or catastrophic plan. Most consumers do not understand or carefully review the policies and information provided to them at the time of the sale, and often become confused or upset when claims are processed and they are left with a large medical bill. Consumers complain that they were misinformed or misled by the agent who sold them the product.

**Possible Remedy:** Require that information be provided by the agent or insurer about OCHI at the time of the proposed sale of any individual health insurance product, including products sold through trusts or association groups. The disclosure should contain OCHI's toll-free telephone number and a statement encouraging the consumer to call OCHI with questions before or after purchasing any health insurance policy.

## **Exhibits**

# OCHI Calls Received (by Zip Code)

From 1/1/2008 To 12/31/2008

| <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> | <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 62214           | Addieville              | 3            | 60101           | Addison                 | 33           |
| 62805           | Akin                    | 1            | 62806           | Albion                  | 3            |
| 60001           | Alden                   | 6            | 61231           | Aledo                   | 3            |
| 61412           | Alexis                  | 2            | 60102           | Algonquin               | 23           |
| 62001           | Alhambra                | 3            | 61413           | Alpha                   | 2            |
| 60803           | Alsip                   | 19           | 62411           | Altamont                | 4            |
| 62002           | Alton                   | 39           | 61414           | Altona                  | 1            |
| 61811           | Alvin                   | 1            | 61310           | Amboy                   | 1            |
| 61720           | Anchor                  | 1            | 61232           | Andalusia               | 1            |
| 62906           | Anna                    | 8            | 61234           | Annawan                 | 1            |
| 60002           | Antioch                 | 30           | 61910           | Arcola                  | 1            |
| 62611           | Arenzville              | 1            | 62501           | Argenta                 | 6            |
| 60004           | Arlington Heights       | 67           | 60005           | Arlington Heights       | 57           |
| 60006           | Arlington Heights       | 7            | 61911           | Arthur                  | 3            |
| 62612           | Ashland                 | 2            | 62808           | Ashley                  | 4            |
| 61006           | Ashton                  | 6            | 62510           | Assumption              | 5            |
| 62613           | Athens                  | 3            | 61913           | Atwood                  | 3            |
| 62615           | Auburn                  | 6            | 60502           | Aurora                  | 22           |
| 60503           | Aurora                  | 12           | 60504           | Aurora                  | 23           |
| 60505           | Aurora                  | 22           | 60506           | Aurora                  | 36           |
| 60507           | Aurora                  | 4            | 60572           | Aurora                  | 4            |
| 62907           | Ava                     | 3            | 60010           | Barrington              | 56           |
| 60011           | Barrington              | 7            | 62312           | Barry                   | 6            |
| 60103           | Bartlett                | 30           | 60510           | Batavia                 | 19           |
| 62314           | Baylis                  | 2            | 62618           | Beardstown              | 4            |
| 62512           | Beason                  | 1            | 60401           | Beecher                 | 6            |
| 62810           | Belle Rive              | 1            | 62220           | Belleville              | 21           |
| 62221           | Belleville              | 21           | 62222           | Belleville              | 1            |
| 62223           | Belleville              | 11           | 62226           | Belleville              | 26           |
| 60104           | Bellwood                | 9            | 61008           | Belvidere               | 27           |
| 61813           | Bement                  | 1            | 60105           | Bensenville             | 1            |
| 60106           | Bensenville             | 12           | 61516           | Benson                  | 1            |
| 62812           | Benton                  | 11           | 60163           | Berkeley                | 11           |
| 60402           | Berwyn                  | 17           | 62010           | Bethalto                | 4            |
| 61914           | Bethany                 | 4            | 60511           | Big Rock                | 4            |
| 62011           | Bingham                 | 1            | 61814           | Bismarck                | 5            |
| 60108           | Bloomington             | 21           | 61701           | Bloomington             | 35           |
| 61702           | Bloomington             | 4            | 61704           | Bloomington             | 22           |
| 61710           | Bloomington             | 2            | 60406           | Blue Island             | 6            |
| 62513           | Blue Mound              | 2            | 62622           | Bluff Springs           | 1            |
| 62621           | Bluffs                  | 2            | 60440           | Bolingbrook             | 39           |

| <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> | <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60490           | Bolingbrook             | 9            | 62815           | Bone Gap                | 1            |
| 60913           | Bonfield                | 2            | 60914           | Bourbonnais             | 13           |
| 62316           | Bowen                   | 1            | 61421           | Bradford                | 1            |
| 60915           | Bradley                 | 11           | 60408           | Braidwood               | 7            |
| 62230           | Breese                  | 3            | 62417           | Bridgeport              | 4            |
| 60455           | Bridgeview              | 7            | 62012           | Brighton                | 6            |
| 61517           | Brimfield               | 2            | 61816           | Broadlands              | 1            |
| 60155           | Broadview               | 7            | 60513           | Brookfield              | 6            |
| 62910           | Brookport               | 2            | 62418           | Brownstown              | 2            |
| 60917           | Buckingham              | 3            | 60918           | Buckley                 | 1            |
| 61314           | Buda                    | 1            | 62515           | Buffalo                 | 2            |
| 60089           | Buffalo Grove           | 45           | 62014           | Bunker Hill             | 2            |
| 60459           | Burbank                 | 11           | 60109           | Burlington              | 1            |
| 62820           | Burnt Prairie           | 1            | 60527           | Burr Ridge              | 21           |
| 61422           | Bushnell                | 2            | 61010           | Byron                   | 5            |
| 61011           | Caledonia               | 1            | 60409           | Calumet City            | 21           |
| 61238           | Cambridge               | 2            | 62320           | Camp Point              | 5            |
| 62916           | Campbell Hill           | 2            | 60920           | Campus                  | 1            |
| 61520           | Canton                  | 13           | 62625           | Cantrall                | 1            |
| 61012           | Capron                  | 2            | 62901           | Carbondale              | 8            |
| 62902           | Carbondale              | 1            | 62903           | Carbondale              | 2            |
| 62626           | Carlinville             | 7            | 61725           | Carlock                 | 1            |
| 62231           | Carlyle                 | 6            | 61425           | Carman                  | 1            |
| 62821           | Carmi                   | 3            | 60116           | Carol Stream            | 1            |
| 60122           | Carol Stream            | 2            | 60125           | Carol Stream            | 2            |
| 60132           | Carol Stream            | 3            | 60188           | Carol Stream            | 36           |
| 60197           | Carol Stream            | 1            | 60199           | Carol Stream            | 2            |
| 60110           | Carpentersville         | 9            | 62917           | Carrier Mills           | 1            |
| 62016           | Carrollton              | 9            | 62918           | Carterville             | 9            |
| 62321           | Carthage                | 3            | 60013           | Cary                    | 21           |
| 62420           | Casey                   | 3            | 62232           | Caseyville              | 6            |
| 61013           | Cedarville              | 2            | 62801           | Centralia               | 15           |
| 61818           | Cerro Gordo             | 1            | 61820           | Champaign               | 15           |
| 61821           | Champaign               | 30           | 61822           | Champaign               | 12           |
| 61824           | Champaign               | 1            | 61826           | Champaign               | 1            |
| 61015           | Chana                   | 2            | 62627           | Chandlerville           | 1            |
| 60410           | Channahon               | 9            | 61920           | Charleston              | 21           |
| 62629           | Chatham                 | 13           | 60922           | Chebanse                | 2            |
| 61726           | Chenoa                  | 3            | 61317           | Cherry                  | 2            |
| 61016           | Cherry Valley           | 8            | 62233           | Chester                 | 5            |
| 62518           | Chestnut                | 1            | 60601           | Chicago                 | 42           |
| 60602           | Chicago                 | 30           | 60603           | Chicago                 | 21           |
| 60604           | Chicago                 | 20           | 60605           | Chicago                 | 19           |
| 60606           | Chicago                 | 58           | 60607           | Chicago                 | 19           |
| 60608           | Chicago                 | 21           | 60609           | Chicago                 | 17           |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60610           | Chicago                 | 45           | 60611           | Chicago                 | 69           |
| 60612           | Chicago                 | 32           | 60613           | Chicago                 | 48           |
| 60614           | Chicago                 | 67           | 60615           | Chicago                 | 24           |
| 60616           | Chicago                 | 22           | 60617           | Chicago                 | 47           |
| 60618           | Chicago                 | 55           | 60619           | Chicago                 | 31           |
| 60620           | Chicago                 | 34           | 60621           | Chicago                 | 12           |
| 60622           | Chicago                 | 44           | 60623           | Chicago                 | 19           |
| 60624           | Chicago                 | 18           | 60625           | Chicago                 | 34           |
| 60626           | Chicago                 | 23           | 60628           | Chicago                 | 30           |
| 60629           | Chicago                 | 27           | 60630           | Chicago                 | 27           |
| 60631           | Chicago                 | 19           | 60632           | Chicago                 | 12           |
| 60633           | Chicago                 | 7            | 60634           | Chicago                 | 32           |
| 60636           | Chicago                 | 15           | 60637           | Chicago                 | 21           |
| 60638           | Chicago                 | 30           | 60639           | Chicago                 | 22           |
| 60640           | Chicago                 | 48           | 60641           | Chicago                 | 28           |
| 60643           | Chicago                 | 28           | 60644           | Chicago                 | 20           |
| 60645           | Chicago                 | 29           | 60646           | Chicago                 | 14           |
| 60647           | Chicago                 | 47           | 60649           | Chicago                 | 23           |
| 60651           | Chicago                 | 24           | 60652           | Chicago                 | 17           |
| 60653           | Chicago                 | 17           | 60654           | Chicago                 | 11           |
| 60655           | Chicago                 | 10           | 60656           | Chicago                 | 16           |
| 60657           | Chicago                 | 48           | 60658           | Chicago                 | 5            |
| 60659           | Chicago                 | 18           | 60660           | Chicago                 | 31           |
| 60661           | Chicago                 | 22           | 60664           | Chicago                 | 2            |
| 60669           | Chicago                 | 1            | 60670           | Chicago                 | 2            |
| 60673           | Chicago                 | 2            | 60674           | Chicago                 | 2            |
| 60677           | Chicago                 | 2            | 60680           | Chicago                 | 3            |
| 60685           | Chicago                 | 2            | 60686           | Chicago                 | 1            |
| 60688           | Chicago                 | 2            | 60695           | Chicago                 | 1            |
| 60696           | Chicago                 | 1            | 60411           | Chicago Heights         | 32           |
| 60412           | Chicago Heights         | 5            | 60415           | Chicago Ridge           | 15           |
| 61523           | Chillicothe             | 10           | 62822           | Christopher             | 6            |
| 60804           | Cicero                  | 15           | 62823           | Cisne                   | 2            |
| 60924           | Cissna Park             | 2            | 60514           | Clarendon Hills         | 7            |
| 60927           | Clifton                 | 3            | 61727           | Clinton                 | 8            |
| 60416           | Coal City               | 7            | 61240           | Coal Valley             | 6            |
| 62920           | Cobden                  | 1            | 62017           | Coffeen                 | 1            |
| 62326           | Colchester              | 1            | 61017           | Coleta                  | 1            |
| 61728           | Colfax                  | 2            | 62234           | Collinsville            | 22           |
| 61241           | Colona                  | 5            | 62921           | Colp                    | 1            |
| 62236           | Columbia                | 8            | 61242           | Cordova                 | 3            |
| 60112           | Cortland                | 5            | 62018           | Cottage Hills           | 1            |
| 62237           | Coulterville            | 1            | 60478           | Country Club Hills      | 16           |
| 62422           | Cowden                  | 1            | 60403           | Crest Hill              | 12           |
| 60417           | Crete                   | 10           | 61610           | Creve Coeur             | 4            |

| <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> | <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60012           | Crystal Lake            | 26           | 60014           | Crystal Lake            | 52           |
| 60039           | Crystal Lake            | 1            | 61427           | Cuba                    | 1            |
| 60929           | Cullom                  | 2            | 62238           | Cutler                  | 3            |
| 62923           | Cypress                 | 1            | 61428           | Dahinda                 | 1            |
| 62828           | Dahlgren                | 1            | 62330           | Dallas City             | 1            |
| 61320           | Dalzell                 | 1            | 61321           | Dana                    | 1            |
| 60930           | Danforth                | 1            | 61732           | Danvers                 | 1            |
| 61832           | Danville                | 25           | 61834           | Danville                | 8            |
| 60561           | Darien                  | 20           | 61019           | Davis                   | 5            |
| 61020           | Davis Junction          | 2            | 62520           | Dawson                  | 1            |
| 60115           | De Kalb                 | 27           | 61839           | De Land                 | 1            |
| 62924           | De Soto                 | 2            | 62521           | Decatur                 | 40           |
| 62522           | Decatur                 | 15           | 62523           | Decatur                 | 3            |
| 62525           | Decatur                 | 1            | 62526           | Decatur                 | 38           |
| 61733           | Deer Creek              | 1            | 60015           | Deerfield               | 43           |
| 61734           | Delavan                 | 2            | 62423           | Dennison                | 1            |
| 61322           | Depue                   | 1            | 60016           | Des Plaines             | 54           |
| 60018           | Des Plaines             | 25           | 60019           | Des Plaines             | 1            |
| 61735           | Dewitt                  | 3            | 62830           | Dix                     | 1            |
| 61021           | Dixon                   | 7            | 60419           | Dolton                  | 14           |
| 62926           | Dongola                 | 7            | 62019           | Donnellson              | 2            |
| 62021           | Dorsey                  | 2            | 62022           | Dow                     | 3            |
| 62927           | Dowell                  | 1            | 60515           | Downers Grove           | 36           |
| 60516           | Downers Grove           | 31           | 61736           | Downs                   | 1            |
| 62832           | Du Quoin                | 7            | 60118           | Dundee                  | 16           |
| 61525           | Dunlap                  | 2            | 62239           | Dupo                    | 1            |
| 60420           | Dwight                  | 4            | 60518           | Earlville               | 1            |
| 62024           | East Alton              | 8            | 62240           | East Carondelet         | 2            |
| 61025           | East Dubuque            | 4            | 61244           | East Moline             | 7            |
| 61611           | East Peoria             | 20           | 62201           | East Saint Louis        | 2            |
| 62202           | East Saint Louis        | 1            | 62203           | East Saint Louis        | 8            |
| 62204           | East Saint Louis        | 5            | 62205           | East Saint Louis        | 7            |
| 62206           | East Saint Louis        | 6            | 62207           | East Saint Louis        | 3            |
| 62633           | Easton                  | 3            | 62531           | Edinburg                | 2            |
| 61528           | Edwards                 | 2            | 62025           | Edwardsville            | 28           |
| 62401           | Effingham               | 31           | 61738           | El Paso                 | 3            |
| 60119           | Elburn                  | 9            | 61324           | Eldena                  | 1            |
| 62930           | Eldorado                | 4            | 62027           | Eldred                  | 2            |
| 60120           | Elgin                   | 29           | 60121           | Elgin                   | 4            |
| 60123           | Elgin                   | 49           | 60124           | Elgin                   | 14           |
| 60007           | Elk Grove Village       | 41           | 60009           | Elk Grove Village       | 6            |
| 62634           | Elkhart                 | 1            | 62241           | Ellis Grove             | 1            |
| 60126           | Elmhurst                | 47           | 61529           | Elmwood                 | 2            |
| 60707           | Elmwood Park            | 19           | 62835           | Enfield                 | 2            |
| 60519           | Eola                    | 1            | 62934           | Equality                | 1            |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 61250           | Erie                    | 1            | 61530           | Eureka                  | 5            |
| 60201           | Evanston                | 31           | 60202           | Evanston                | 37           |
| 60203           | Evanston                | 2            | 60204           | Evanston                | 3            |
| 60208           | Evanston                | 1            | 60209           | Evanston                | 1            |
| 62242           | Evansville              | 2            | 60805           | Evergreen Park          | 8            |
| 61739           | Fairbury                | 2            | 62837           | Fairfield               | 7            |
| 61432           | Fairview                | 2            | 62208           | Fairview Heights        | 7            |
| 62838           | Farina                  | 2            | 61842           | Farmer City             | 2            |
| 62533           | Farmersville            | 3            | 61531           | Farmington              | 1            |
| 62030           | Fidelity                | 1            | 62031           | Fieldon                 | 1            |
| 62032           | Fillmore                | 1            | 61843           | Fisher                  | 4            |
| 61740           | Flanagan                | 4            | 62427           | Flat Rock               | 3            |
| 62839           | Flora                   | 3            | 60422           | Flossmoor               | 8            |
| 60130           | Forest Park             | 11           | 61741           | Forrest                 | 1            |
| 61030           | Forreston               | 4            | 62535           | Forsyth                 | 7            |
| 60020           | Fox Lake                | 5            | 60021           | Fox River Grove         | 9            |
| 60597           | Fox Valley              | 1            | 60599           | Fox Valley              | 1            |
| 60423           | Frankfort               | 22           | 62638           | Franklin                | 1            |
| 60131           | Franklin Park           | 9            | 62243           | Freeburg                | 6            |
| 61032           | Freeport                | 32           | 61252           | Fulton                  | 2            |
| 62244           | Fults                   | 2            | 62935           | Galatia                 | 3            |
| 61036           | Galena                  | 9            | 61401           | Galesburg               | 22           |
| 61402           | Galesburg               | 1            | 61434           | Galva                   | 5            |
| 61038           | Garden Prairie          | 1            | 61928           | Gays                    | 1            |
| 62842           | Geff                    | 1            | 61254           | Geneseo                 | 3            |
| 60134           | Geneva                  | 20           | 60135           | Genoa                   | 8            |
| 61846           | Georgetown              | 1            | 62245           | Germantown              | 2            |
| 60936           | Gibson City             | 3            | 60136           | Gilberts                | 2            |
| 62033           | Gillespie               | 6            | 62640           | Girard                  | 8            |
| 62034           | Glen Carbon             | 15           | 60137           | Glen Ellyn              | 24           |
| 60138           | Glen Ellyn              | 1            | 60022           | Glencoe                 | 18           |
| 60139           | Glendale Heights        | 20           | 60025           | Glenview                | 43           |
| 60026           | Glenview Nas            | 14           | 60425           | Glenwood                | 5            |
| 62035           | Godfrey                 | 15           | 62938           | Golconda                | 2            |
| 62339           | Golden                  | 1            | 61438           | Good Hope               | 1            |
| 62939           | Goreville               | 5            | 62940           | Gorham                  | 1            |
| 62037           | Grafton                 | 4            | 62941           | Grand Chain             | 2            |
| 61325           | Grand Ridge             | 2            | 62942           | Grand Tower             | 1            |
| 62040           | Granite City            | 44           | 60940           | Grant Park              | 1            |
| 62943           | Grantsburg              | 2            | 61743           | Graymont                | 1            |
| 60030           | Grayslake               | 33           | 61534           | Green Valley            | 2            |
| 62044           | Greenfield              | 2            | 62642           | Greenview               | 2            |
| 62246           | Greenville              | 13           | 60036           | Greys Lake              | 1            |
| 61744           | Gridley                 | 7            | 61535           | Groveland               | 2            |
| 60031           | Gurnee                  | 33           | 62045           | Hamburg                 | 1            |



| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 62046           | Hamel                   | 1            | 62341           | Hamilton                | 1            |
| 60140           | Hampshire               | 15           | 61256           | Hampton                 | 1            |
| 61536           | Hanna City              | 1            | 61041           | Hanover                 | 2            |
| 60133           | Hanover Park            | 15           | 62047           | Hardin                  | 1            |
| 62946           | Harrisburg              | 9            | 62048           | Hartford                | 2            |
| 62643           | Hartsburg               | 2            | 60033           | Harvard                 | 7            |
| 62538           | Harvel                  | 1            | 60426           | Harvey                  | 11           |
| 62644           | Havana                  | 4            | 60429           | Hazel Crest             | 14           |
| 60034           | Hebron                  | 2            | 61537           | Henry                   | 4            |
| 62431           | Herrick                 | 3            | 62948           | Herrin                  | 15           |
| 60941           | Herscher                | 4            | 61745           | Heyworth                | 3            |
| 60457           | Hickory Hills           | 5            | 62249           | Highland                | 16           |
| 60035           | Highland Park           | 28           | 60040           | Highwood                | 4            |
| 62049           | Hillsboro               | 2            | 60162           | Hillside                | 13           |
| 60520           | Hinckley                | 1            | 61930           | Hindsboro               | 1            |
| 60521           | Hinsdale                | 25           | 60522           | Hinsdale                | 3            |
| 60570           | Hinsdale                | 1            | 62250           | Hoffman                 | 2            |
| 60169           | Hoffman Estates         | 26           | 61849           | Homer                   | 1            |
| 60491           | Homer Glen              | 19           | 60456           | Hometown                | 3            |
| 60430           | Homewood                | 21           | 60942           | Hoopeston               | 2            |
| 61747           | Hopedale                | 1            | 62803           | Hoyleton                | 1            |
| 61748           | Hudson                  | 5            | 62252           | Huey                    | 2            |
| 60142           | Huntley                 | 31           | 61259           | Illinois City           | 2            |
| 62539           | Illioopolis             | 4            | 99999           | In Illinois             | 2355         |
| 62846           | Ina                     | 2            | 61440           | Industry                | 1            |
| 60041           | Ingleside               | 11           | 61441           | Ipava                   | 1            |
| 62848           | Irvington               | 1            | 60042           | Island Lake             | 13           |
| 60143           | Itasca                  | 18           | 62849           | Iuka                    | 1            |
| 62650           | Jacksonville            | 23           | 62651           | Jacksonville            | 1            |
| 62950           | Jacob                   | 2            | 62052           | Jerseyville             | 7            |
| 62951           | Johnston City           | 2            | 60431           | Joliet                  | 12           |
| 60432           | Joliet                  | 9            | 60433           | Joliet                  | 9            |
| 60434           | Joliet                  | 2            | 60435           | Joliet                  | 42           |
| 60436           | Joliet                  | 6            | 62952           | Jonesboro               | 5            |
| 62953           | Joppa                   | 1            | 60458           | Justice                 | 7            |
| 60901           | Kankakee                | 21           | 61933           | Kansas                  | 2            |
| 62956           | Karnak                  | 1            | 61442           | Keithsburg              | 1            |
| 62853           | Kell                    | 2            | 60043           | Kenilworth              | 3            |
| 61749           | Kenney                  | 2            | 61443           | Kewanee                 | 12           |
| 62540           | Kincaid                 | 2            | 60145           | Kingston                | 4            |
| 62854           | Kinmundy                | 2            | 60146           | Kirkland                | 5            |
| 61447           | Kirkwood                | 1            | 61448           | Knoxville               | 1            |
| 60525           | La Grange               | 33           | 60526           | La Grange Park          | 12           |
| 61450           | La Harpe                | 3            | 61330           | La Moille               | 1            |
| 61301           | La Salle                | 10           | 61540           | Lacon                   | 2            |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 61329           | Ladd                    | 2            | 60044           | Lake Bluff              | 7            |
| 60045           | Lake Forest             | 20           | 60156           | Lake in the Hills       | 26           |
| 60046           | Lake Villa              | 11           | 60047           | Lake Zurich             | 35           |
| 61046           | Lanark                  | 2            | 60438           | Lansing                 | 17           |
| 62439           | Lawrenceville           | 6            | 61752           | Le Roy                  | 4            |
| 62254           | Lebanon                 | 1            | 60530           | Lee                     | 1            |
| 60531           | Leland                  | 3            | 60439           | Lemont                  | 23           |
| 61048           | Lena                    | 2            | 61542           | Lewistown               | 3            |
| 61753           | Lexington               | 1            | 62347           | Liberty                 | 6            |
| 60048           | Libertyville            | 28           | 60092           | Libertyville            | 1            |
| 62656           | Lincoln                 | 25           | 60069           | Lincolnshire            | 7            |
| 60712           | Lincolnwood             | 10           | 60532           | Lisle                   | 30           |
| 62056           | Litchfield              | 6            | 61453           | Little York             | 2            |
| 62058           | Livingston              | 1            | 62661           | Loami                   | 2            |
| 60441           | Lockport                | 21           | 61454           | Lomax                   | 1            |
| 60148           | Lombard                 | 40           | 61544           | London Mills            | 1            |
| 60049           | Long Grove              | 1            | 62349           | Lorraine                | 1            |
| 62858           | Louisville              | 5            | 61111           | Loves Park              | 17           |
| 60949           | Ludlow                  | 1            | 61261           | Lyndon                  | 1            |
| 60534           | Lyons                   | 5            | 61115           | Machesney Park          | 14           |
| 61150           | Machesney Park          | 2            | 61755           | Mackinaw                | 4            |
| 61455           | Macomb                  | 7            | 62544           | Macon                   | 2            |
| 62060           | Madison                 | 1            | 62256           | Maeystown               | 1            |
| 61336           | Magnolia                | 1            | 61853           | Mahomet                 | 5            |
| 60150           | Malta                   | 3            | 62663           | Manchester              | 3            |
| 60442           | Manhattan               | 6            | 61546           | Manito                  | 6            |
| 61854           | Mansfield               | 2            | 60950           | Manteno                 | 8            |
| 60151           | Maple Park              | 5            | 61547           | Mapleton                | 2            |
| 61458           | Maquon                  | 3            | 60152           | Marengo                 | 10           |
| 62959           | Marion                  | 21           | 62257           | Marissa                 | 4            |
| 60428           | Markham                 | 6            | 61341           | Marseilles              | 4            |
| 62441           | Marshall                | 4            | 62442           | Martinsville            | 1            |
| 62062           | Maryville               | 11           | 62224           | Mascoutah               | 1            |
| 62258           | Mascoutah               | 2            | 62443           | Mason                   | 1            |
| 60443           | Matteson                | 11           | 61938           | Mattoon                 | 14           |
| 60153           | Maywood                 | 12           | 60444           | Mazon                   | 1            |
| 62957           | Mc Clure                | 6            | 61050           | Mc Connell              | 1            |
| 60050           | Mc Henry                | 27           | 60051           | Mc Henry                | 27           |
| 62859           | Mc Leansboro            | 2            | 61335           | Mc Nabb                 | 1            |
| 61460           | Media                   | 1            | 60157           | Medinah                 | 4            |
| 62063           | Medora                  | 4            | 60160           | Melrose Park            | 12           |
| 60161           | Melrose Park            | 1            | 60164           | Melrose Park            | 11           |
| 62351           | Mendon                  | 3            | 61342           | Mendota                 | 9            |
| 62665           | Meredosia               | 1            | 61548           | Metamora                | 6            |
| 62960           | Metropolis              | 5            | 60445           | Midlothian              | 25           |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 61264           | Milan                   | 3            | 60536           | Millbrook               | 1            |
| 60537           | Millington              | 2            | 62260           | Millstadt               | 5            |
| 61855           | Milmine                 | 2            | 61759           | Minier                  | 1            |
| 61760           | Minonk                  | 1            | 60447           | Minooka                 | 10           |
| 60448           | Mokena                  | 23           | 61265           | Moline                  | 30           |
| 60954           | Momence                 | 4            | 60449           | Monee                   | 7            |
| 61462           | Monmouth                | 8            | 61052           | Monroe Center           | 1            |
| 60538           | Montgomery              | 16           | 61856           | Monticello              | 9            |
| 62067           | Moro                    | 3            | 60450           | Morris                  | 10           |
| 61270           | Morrison                | 7            | 62546           | Morrisonville           | 4            |
| 61550           | Morton                  | 17           | 60053           | Morton Grove            | 24           |
| 62964           | Mounds                  | 1            | 62547           | Mount Auburn            | 2            |
| 62863           | Mount Carmel            | 5            | 61053           | Mount Carroll           | 2            |
| 61054           | Mount Morris            | 7            | 62069           | Mount Olive             | 5            |
| 60056           | Mount Prospect          | 43           | 62548           | Mount Pulaski           | 4            |
| 62353           | Mount Sterling          | 2            | 62864           | Mount Vernon            | 19           |
| 62550           | Moweaqua                | 2            | 62549           | Mt Zion                 | 1            |
| 62262           | Mulberry Grove          | 1            | 62865           | Mulkeytown              | 1            |
| 60060           | Mundelein               | 16           | 62966           | Murphysboro             | 8            |
| 62668           | Murrayville             | 1            | 60540           | Naperville              | 54           |
| 60563           | Naperville              | 34           | 60564           | Naperville              | 23           |
| 60565           | Naperville              | 34           | 60566           | Naperville              | 1            |
| 60567           | Naperville              | 1            | 62263           | Nashville               | 4            |
| 62354           | Nauvoo                  | 4            | 62447           | Neoga                   | 4            |
| 62264           | New Athens              | 2            | 62265           | New Baden               | 1            |
| 62670           | New Berlin              | 3            | 62356           | New Canton              | 1            |
| 62074           | New Douglas             | 2            | 62671           | New Holland             | 1            |
| 60451           | New Lenox               | 20           | 60541           | Newark                  | 4            |
| 62448           | Newton                  | 4            | 62551           | Niantic                 | 2            |
| 60714           | Niles                   | 22           | 62672           | Nilwood                 | 2            |
| 62358           | Niota                   | 1            | 62868           | Noble                   | 1            |
| 62075           | Nokomis                 | 6            | 61761           | Normal                  | 31           |
| 62869           | Norris City             | 3            | 60542           | North Aurora            | 13           |
| 60064           | North Chicago           | 7            | 60086           | North Chicago           | 1            |
| 60062           | Northbrook              | 65           | 60065           | Northbrook              | 3            |
| 62269           | O Fallon                | 22           | 60523           | Oak Brook               | 23           |
| 60452           | Oak Forest              | 22           | 60453           | Oak Lawn                | 34           |
| 60454           | Oak Lawn                | 1            | 60301           | Oak Park                | 9            |
| 60302           | Oak Park                | 25           | 60303           | Oak Park                | 2            |
| 60304           | Oak Park                | 17           | 62673           | Oakford                 | 1            |
| 61943           | Oakland                 | 1            | 61858           | Oakwood                 | 3            |
| 62449           | Oblong                  | 2            | 60460           | Odell                   | 2            |
| 62870           | Odin                    | 1            | 61859           | Ogden                   | 1            |
| 61348           | Oglesby                 | 4            | 61349           | Ohio                    | 1            |
| 62271           | Okawville               | 4            | 62450           | Olney                   | 5            |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60461           | Olympia Fields          | 4            | 60955           | Onarga                  | 3            |
| 61467           | Oneida                  | 3            | 61469           | Oquawka                 | 1            |
| 61060           | Orangeville             | 1            | 62554           | Oreana                  | 1            |
| 61061           | Oregon                  | 2            | 61273           | Orion                   | 2            |
| 60462           | Orland Park             | 35           | 60467           | Orland Park             | 29           |
| 60543           | Oswego                  | 17           | 61350           | Ottawa                  | 18           |
| 88888           | Out of Illinois         | 2034         | 60055           | Palatine                | 1            |
| 60067           | Palatine                | 37           | 60074           | Palatine                | 34           |
| 62674           | Palmyra                 | 3            | 60463           | Palos Heights           | 22           |
| 60465           | Palos Hills             | 19           | 60464           | Palos Park              | 10           |
| 62557           | Pana                    | 5            | 62077           | Panama                  | 3            |
| 61944           | Paris                   | 8            | 60466           | Park Forest             | 22           |
| 60068           | Park Ridge              | 40           | 62452           | Parkersburg             | 1            |
| 62875           | Patoka                  | 2            | 61353           | Paw Paw                 | 2            |
| 62558           | Pawnee                  | 2            | 60957           | Paxton                  | 1            |
| 61062           | Pearl City              | 1            | 61063           | Pecatonica              | 1            |
| 61554           | Pekin                   | 32           | 61555           | Pekin                   | 1            |
| 61601           | Peoria                  | 1            | 61602           | Peoria                  | 10           |
| 61603           | Peoria                  | 5            | 61604           | Peoria                  | 20           |
| 61605           | Peoria                  | 3            | 61606           | Peoria                  | 4            |
| 61607           | Peoria                  | 11           | 61614           | Peoria                  | 37           |
| 61615           | Peoria                  | 13           | 61634           | Peoria                  | 1            |
| 61637           | Peoria                  | 2            | 61641           | Peoria                  | 1            |
| 61616           | Peoria Heights          | 2            | 60468           | Peotone                 | 2            |
| 61354           | Peru                    | 9            | 61863           | Pesotum                 | 1            |
| 62675           | Petersburg              | 8            | 62079           | Piasa                   | 1            |
| 62274           | Pinckneyville           | 16           | 62363           | Pittsfield              | 10           |
| 60544           | Plainfield              | 15           | 60585           | Plainfield              | 14           |
| 60586           | Plainfield              | 27           | 62365           | Plainville              | 2            |
| 60545           | Plano                   | 10           | 62366           | Pleasant Hill           | 1            |
| 62677           | Pleasant Plains         | 6            | 62367           | Plymouth                | 1            |
| 62275           | Pocahontas              | 4            | 61064           | Polo                    | 3            |
| 62975           | Pomona                  | 2            | 61764           | Pontiac                 | 13           |
| 61065           | Poplar Grove            | 2            | 61275           | Port Byron              | 3            |
| 62277           | Prairie Du Rocher       | 3            | 61356           | Princeton               | 13           |
| 61559           | Princeville             | 2            | 61277           | Prophetstown            | 2            |
| 60070           | Prospect Heights        | 16           | 62976           | Pulaski                 | 1            |
| 62301           | Quincy                  | 37           | 62305           | Quincy                  | 11           |
| 62306           | Quincy                  | 1            | 62080           | Ramsey                  | 5            |
| 60960           | Rankin                  | 1            | 61866           | Rantoul                 | 13           |
| 61471           | Raritan                 | 1            | 62278           | Red Bud                 | 11           |
| 61279           | Reynolds                | 1            | 60071           | Richmond                | 1            |
| 60471           | Richton Park            | 3            | 62877           | Richview                | 1            |
| 61067           | Ridott                  | 1            | 60072           | Ringwood                | 1            |
| 61472           | Rio                     | 1            | 60305           | River Forest            | 10           |

| <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> | <b>Zip Code</b> | <b>Post Office Name</b> | <b>Calls</b> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60171           | River Grove             | 8            | 60627           | Riverdale               | 1            |
| 60827           | Riverdale               | 16           | 60546           | Riverside               | 6            |
| 62561           | Riverton                | 4            | 60472           | Robbins                 | 2            |
| 62454           | Robinson                | 9            | 61068           | Rochelle                | 10           |
| 62563           | Rochester               | 11           | 61071           | Rock Falls              | 8            |
| 61201           | Rock Island             | 14           | 62081           | Rockbridge              | 1            |
| 61101           | Rockford                | 10           | 61102           | Rockford                | 7            |
| 61103           | Rockford                | 16           | 61104           | Rockford                | 13           |
| 61105           | Rockford                | 1            | 61106           | Rockford                | 1            |
| 61107           | Rockford                | 44           | 61108           | Rockford                | 36           |
| 61109           | Rockford                | 22           | 61114           | Rockford                | 12           |
| 61125           | Rockford                | 2            | 61132           | Rockford                | 1            |
| 62370           | Rockport                | 1            | 61072           | Rockton                 | 9            |
| 62280           | Rockwood                | 1            | 60008           | Rolling Meadows         | 30           |
| 60446           | Romeoville              | 14           | 62082           | Roodhouse               | 4            |
| 61073           | Roscoe                  | 12           | 60172           | Roselle                 | 21           |
| 60706           | Rosemont                | 17           | 60073           | Round Lake              | 32           |
| 62084           | Roxana                  | 1            | 62681           | Rushville               | 1            |
| 61872           | Sadorus                 | 1            | 60964           | Saint Anne              | 3            |
| 61474           | Saint Augustine         | 2            | 60174           | Saint Charles           | 45           |
| 60175           | Saint Charles           | 20           | 61563           | Saint David             | 2            |
| 62281           | Saint Jacob             | 5            | 61873           | Saint Joseph            | 6            |
| 62282           | Saint Libory            | 1            | 62881           | Salem                   | 7            |
| 62882           | Sandoval                | 2            | 60548           | Sandwich                | 7            |
| 61074           | Savanna                 | 4            | 61874           | Savoy                   | 5            |
| 61075           | Scales Mound            | 1            | 60173           | Schaumburg              | 19           |
| 60192           | Schaumburg              | 12           | 60193           | Schaumburg              | 37           |
| 60194           | Schaumburg              | 21           | 60195           | Schaumburg              | 6            |
| 60196           | Schaumburg              | 2            | 60176           | Schiller Park           | 6            |
| 61076           | Scioto Mills            | 1            | 62225           | Scott Air Force Base    | 1            |
| 61360           | Seneca                  | 3            | 60549           | Serena                  | 2            |
| 62884           | Sesser                  | 4            | 60550           | Shabbona                | 1            |
| 61078           | Shannon                 | 2            | 62984           | Shawneetown             | 3            |
| 62565           | Shelbyville             | 11           | 60551           | Sheridan                | 2            |
| 62684           | Sherman                 | 3            | 61281           | Sherrard                | 3            |
| 62685           | Shipman                 | 3            | 62885           | Shobonier               | 1            |
| 60404           | Shorewood               | 15           | 62461           | Shumway                 | 3            |
| 61876           | Sidell                  | 1            | 61282           | Silvis                  | 3            |
| 62985           | Simpson                 | 1            | 60076           | Skokie                  | 36           |
| 60077           | Skokie                  | 28           | 61477           | Smithfield              | 2            |
| 62086           | Sorento                 | 5            | 61080           | South Beloit            | 5            |
| 60177           | South Elgin             | 17           | 60473           | South Holland           | 18           |
| 61565           | Sparland                | 1            | 62286           | Sparta                  | 7            |
| 60081           | Spring Grove            | 7            | 61362           | Spring Valley           | 8            |
| 62701           | Springfield             | 6            | 62702           | Springfield             | 64           |

| <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> | <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 62703           | Springfield             | 48           | 62704           | Springfield             | 114          |
| 62705           | Springfield             | 5            | 62706           | Springfield             | 2            |
| 62707           | Springfield             | 13           | 62708           | Springfield             | 4            |
| 62711           | Springfield             | 22           | 62712           | Springfield             | 10           |
| 62713           | Springfield             | 1            | 62716           | Springfield             | 1            |
| 62726           | Springfield             | 1            | 62764           | Springfield             | 1            |
| 62767           | Springfield             | 8            | 62769           | Springfield             | 2            |
| 62781           | Springfield             | 2            | 61363           | Standard                | 2            |
| 61774           | Stanford                | 2            | 62088           | Staunton                | 12           |
| 62288           | Steeleville             | 3            | 60475           | Steger                  | 10           |
| 61081           | Sterling                | 10           | 60553           | Steward                 | 2            |
| 62463           | Stewardson              | 2            | 61084           | Stillman Valley         | 5            |
| 61085           | Stockton                | 2            | 60165           | Stone Park              | 2            |
| 62987           | Stonefort               | 2            | 62567           | Stonington              | 2            |
| 62465           | Strasburg               | 3            | 60107           | Streamwood              | 36           |
| 61364           | Streator                | 8            | 60554           | Sugar Grove             | 8            |
| 61951           | Sullivan                | 5            | 60501           | Summit Argo             | 11           |
| 62466           | Sumner                  | 1            | 62373           | Sutter                  | 2            |
| 60178           | Sycamore                | 8            | 61482           | Table Grove             | 1            |
| 62688           | Tallula                 | 4            | 62988           | Tamms                   | 1            |
| 61283           | Tampico                 | 3            | 62089           | Taylor Springs          | 2            |
| 62568           | Taylorville             | 25           | 62467           | Teutopolis              | 1            |
| 62889           | Texico                  | 1            | 60968           | Thawville               | 1            |
| 62990           | Thebes                  | 5            | 61285           | Thomson                 | 1            |
| 60476           | Thornton                | 3            | 61833           | Tilton                  | 1            |
| 62375           | Timewell                | 2            | 60477           | Tinley Park             | 26           |
| 60487           | Tinley Park             | 9            | 62468           | Toledo                  | 4            |
| 61880           | Tolono                  | 4            | 61369           | Toluca                  | 2            |
| 61370           | Tonica                  | 4            | 61567           | Topeka                  | 1            |
| 61568           | Tremont                 | 3            | 62293           | Trenton                 | 5            |
| 61569           | Trivoli                 | 1            | 62294           | Troy                    | 14           |
| 62991           | Tunnel Hill             | 2            | 61953           | Tuscola                 | 8            |
| 60180           | Union                   | 2            | 60969           | Union Hill              | 1            |
| 61801           | Urbana                  | 21           | 61802           | Urbana                  | 11           |
| 61803           | Urbana                  | 1            | 62295           | Valmeyer                | 3            |
| 62471           | Vandalia                | 8            | 61375           | Varna                   | 4            |
| 62090           | Venice                  | 1            | 60061           | Vernon Hills            | 26           |
| 60479           | Verona                  | 1            | 62378           | Versailles              | 2            |
| 62995           | Vienna                  | 7            | 61956           | Villa Grove             | 1            |
| 60181           | Villa Park              | 31           | 62996           | Villa Ridge             | 1            |
| 62690           | Virden                  | 3            | 62691           | Virginia                | 3            |
| 60083           | Wadsworth               | 11           | 61376           | Walnut                  | 1            |
| 62893           | Walnut Hill             | 2            | 61777           | Wapella                 | 1            |
| 61087           | Warren                  | 1            | 60555           | Warrenville             | 11           |
| 61571           | Washington              | 16           | 62298           | Waterloo                | 13           |

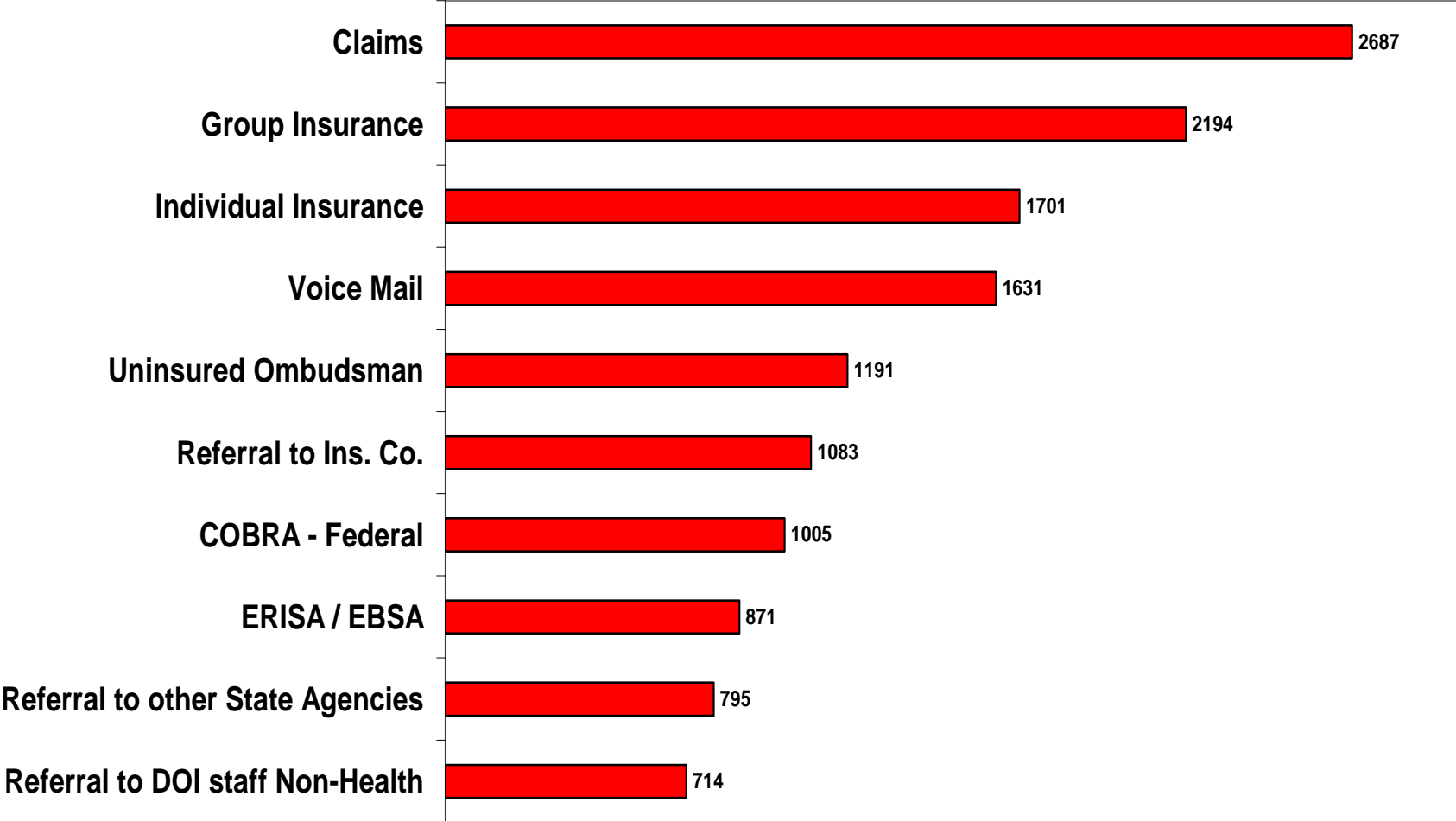
| <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> | <u>Zip Code</u> | <u>Post Office Name</u> | <u>Calls</u> |
|-----------------|-------------------------|--------------|-----------------|-------------------------|--------------|
| 60556           | Waterman                | 2            | 60970           | Watseka                 | 6            |
| 62473           | Watson                  | 1            | 60084           | Wauconda                | 17           |
| 60085           | Waukegan                | 34           | 60087           | Waukegan                | 13           |
| 62692           | Waverly                 | 3            | 60184           | Wayne                   | 3            |
| 62895           | Wayne City              | 2            | 60557           | Wedron                  | 1            |
| 61882           | Weldon                  | 1            | 61378           | West Brooklyn           | 1            |
| 60185           | West Chicago            | 29           | 60186           | West Chicago            | 1            |
| 62896           | West Frankfort          | 9            | 62380           | West Point              | 2            |
| 62476           | West Salem              | 1            | 62477           | West Union              | 1            |
| 60154           | Westchester             | 12           | 60558           | Western Springs         | 11           |
| 60559           | Westmont                | 20           | 61883           | Westville               | 2            |
| 60187           | Wheaton                 | 44           | 60189           | Wheaton                 | 16           |
| 60090           | Wheeling                | 32           | 62092           | White Hall              | 2            |
| 61884           | White Heath             | 1            | 62897           | Whittington             | 1            |
| 61489           | Williamsfield           | 1            | 62693           | Williamsville           | 5            |
| 62997           | Willisville             | 2            | 62480           | Willow Hill             | 1            |
| 60480           | Willow Springs          | 5            | 60091           | Wilmette                | 28           |
| 60481           | Wilmington              | 10           | 62694           | Winchester              | 4            |
| 61957           | Windsor                 | 1            | 60190           | Winfield                | 6            |
| 61088           | Winnebago               | 4            | 60093           | Winnetka                | 34           |
| 60096           | Winthrop Harbor         | 5            | 60097           | Wonder Lake             | 7            |
| 60191           | Wood Dale               | 18           | 62095           | Wood River              | 11           |
| 61490           | Woodhull                | 1            | 62898           | Woodlawn                | 1            |
| 60517           | Woodridge               | 13           | 62695           | Woodson                 | 1            |
| 60098           | Woodstock               | 24           | 61091           | Woosung                 | 2            |
| 62097           | Worden                  | 2            | 60482           | Worth                   | 5            |
| 61491           | Wyoming                 | 3            | 62899           | Xenia                   | 2            |
| 60560           | Yorkville               | 15           | 62999           | Zeigler                 | 2            |
| 60099           | Zion                    | 17           |                 |                         |              |

## TOTALS

**OCHI received calls from 1039 Zip Codes.**

**OCHI received 14229 calls.**

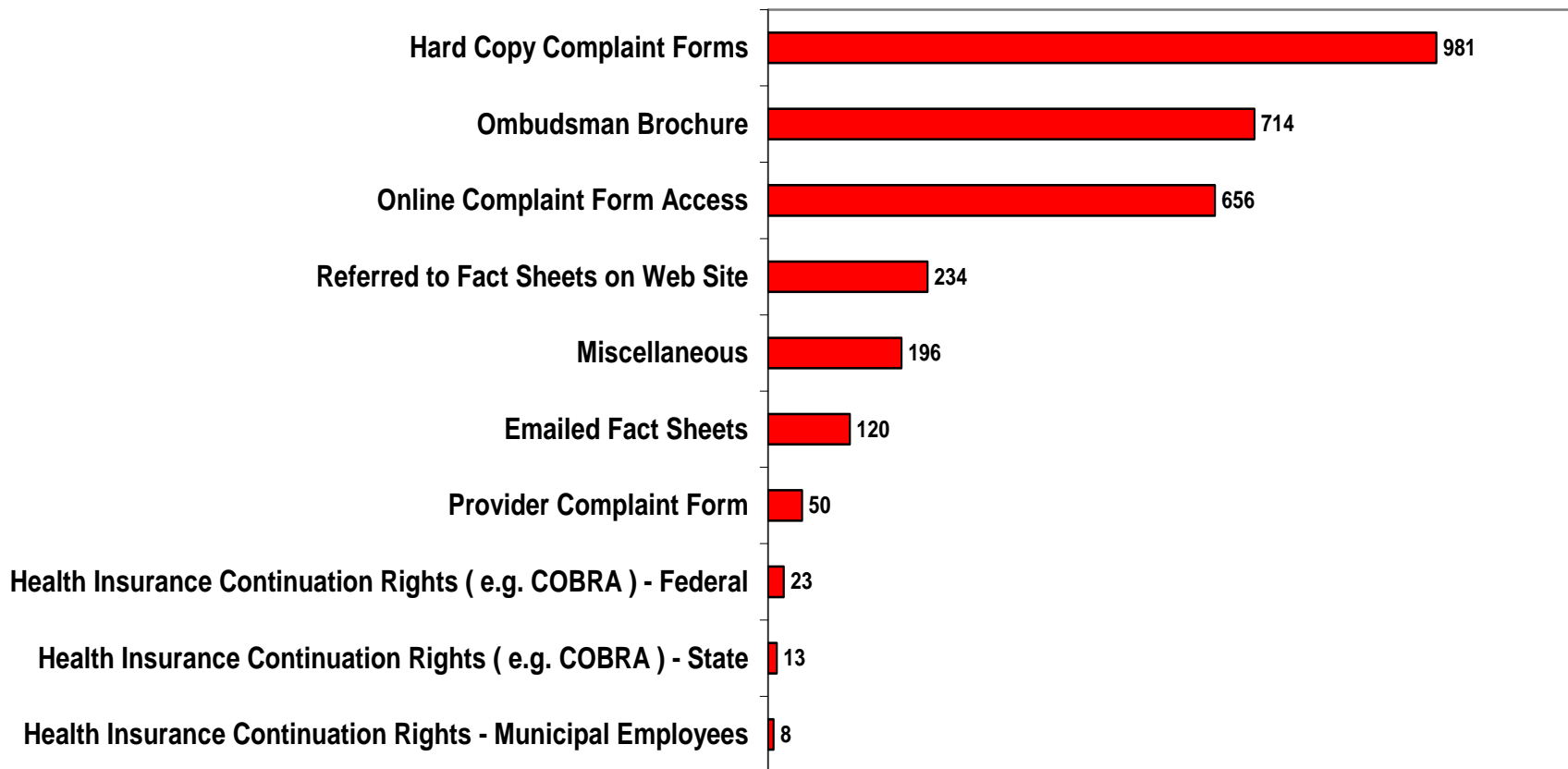
**Calls received by OCHI (by Category)  
(Top 10)**



**EXHIBIT 2**



## Materials Sent to Consumers by OCHI (Top 10)



### EXHIBIT 3

# Calls Received by OCHI Per Month

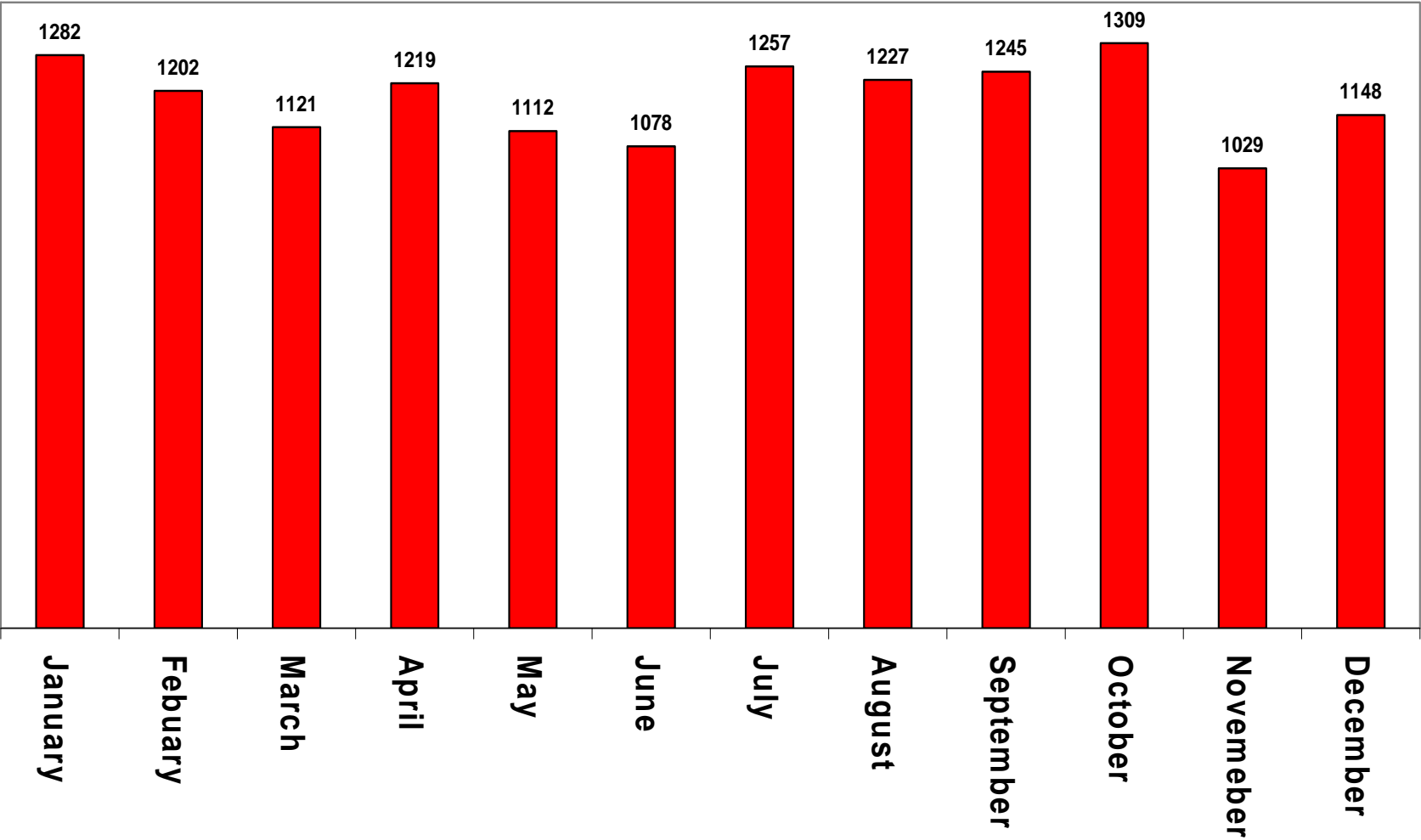


EXHIBIT 4

## HMO Company Complaint Record -- General Summary 2007

| Company Name                             | Number of Complaints Originated by: |                  |                      |                      |              |                     |                                 | Disposition of Complaints |                   |                          |                      |
|--|-------------------------------------|------------------|----------------------|----------------------|--------------|---------------------|---------------------------------|---------------------------|-------------------|--------------------------|----------------------|
|  | HCB-Enrollment                      | Total Complaints | Total DOJ Complaints | A) Consumer/Enrollee | B) Provider  | C) Other Individual | Complaints with External Review | A) Relief Granted         | B) Partial Relief | C) Information Furnished | D) No Relief Granted |
| AETNA HEALTH OF ILLINOIS                 | 52,255                              | 1,436            | 20                   | 522                  | 820          | 94                  | 2                               | 404                       | 24                | 1,006                    | 2                    |
| CIGNA HEALTHCARE OF ILLINOIS INC         | 2,127                               | 74               | 2                    | 49                   | 23           | 2                   | 0                               | 52                        | 1                 | 8                        | 13                   |
| CIGNA HEALTHCARE OF ST LOUIS INC         | 476                                 | 13               | 0                    | 3                    | 10           | 0                   | 0                               | 10                        | 0                 | 2                        | 1                    |
| GREAT-WEST HEALTHCARE OF ILLINOIS        | 2,401                               | 0                | 2                    | 0                    | 0            | 0                   | 0                               | 0                         | 0                 | 0                        | 0                    |
| GROUP HEALTH PLAN INC                    | 17,546                              | 7                | 7                    | 5                    | 2            | 0                   | 0                               | 1                         | 0                 | 1                        | 5                    |
| HEALTH ALLIANCE MEDICAL PLANS INC        | 127,114                             | 359              | 35                   | 319                  | 29           | 11                  | 23                              | 66                        | 4                 | 10                       | 279                  |
| HEALTH ALLIANCE MIDWEST INC              | 201                                 | 0                | 0                    | 0                    | 0            | 0                   | 0                               | 0                         | 0                 | 0                        | 0                    |
| HEALTH CARE SERVICE CORP MUT LEG RES CO  | 695,248                             | 405              | 190                  | 260                  | 113          | 32                  | 0                               | 145                       | 157               | 16                       | 87                   |
| HMO MISSOURI INC                         | 0                                   | 0                | 0                    | 0                    | 0            | 0                   | 0                               | 0                         | 0                 | 0                        | 0                    |
| HUMANA HEALTH PLAN INC                   | 40,102                              | 514              | 50                   | 474                  | 34           | 6                   | 1                               | 311                       | 12                | 3                        | 188                  |
| MEDICAL ASSOCIATES HEALTH PLAN INC       | 2,169                               | 7                | 0                    | 3                    | 4            | 0                   | 0                               | 3                         | 0                 | 2                        | 2                    |
| MERCY HEALTH PLANS OF MISSOURI INC       | 1,835                               | 6                | 1                    | 2                    | 0            | 4                   | 0                               | 0                         | 0                 | 5                        | 1                    |
| NEVADACARE INC                           | 18                                  | 15               | 1                    | 0                    | 15           | 0                   | 0                               | 6                         | 0                 | 0                        | 9                    |
| OSF HEALTH PLANS INC                     | 33,901                              | 153              | 10                   | 119                  | 24           | 10                  | 0                               | 51                        | 0                 | 1                        | 101                  |
| PERSONALCARE INSURANCE OF ILLINOIS INC   | 45,191                              | 407              | 42                   | 288                  | 113          | 6                   | 27                              | 108                       | 5                 | 3                        | 291                  |
| UNICARE HEALTH PLANS OF THE MIDWEST INC  | 98,188                              | 350              | 26                   | 256                  | 93           | 1                   | 12                              | 209                       | 5                 | 13                       | 123                  |
| UNION HEALTH SERVICE INC                 | 22                                  | 21               | 0                    | 19                   | 0            | 2                   | 0                               | 11                        | 3                 | 4                        | 3                    |
| UNITED HEALTHCARE OF ILLINOIS INC        | 17,605                              | 191              | 26                   | 84                   | 55           | 52                  | 0                               | 87                        | 0                 | 7                        | 97                   |
| UNITED HEALTHCARE OF THE MIDWEST INC     | 248                                 | 13               | 1                    | 5                    | 5            | 3                   | 0                               | 5                         | 0                 | 2                        | 6                    |
| UNITEDHEALTHCARE PLAN OF THE RIVERVALLEY | 13,889                              | 98               | 10                   | 93                   | 5            | 0                   | 4                               | 32                        | 3                 | 15                       | 48                   |
| <b>TOTALS</b>                            | <b>1,150,536</b>                    | <b>4,069</b>     | <b>423</b>           | <b>2,501</b>         | <b>1,345</b> | <b>223</b>          | <b>69</b>                       | <b>1,501</b>              | <b>214</b>        | <b>1,098</b>             | <b>1,256</b>         |

As of: December 31, 2007

Source: Illinois Department of Financial And Professional Regulation - Division of Insurance

Published: Wednesday, June 11, 2008

HMO Company Complaint Record -- Classification Summary 2007

Number of Complaints  
Classified as:

| Company Name                            | HCP Enrollment   | Total Complaints | Total DOI Complaints | A) Denial of Care or Treatment | B) Denial of Diagnostic Procedure | C) Denial of Referral Request | D) Sufficient Choice & Accessibility of HCP | E) Underwriting | F) Marketing and Sales | G) Claims and Review | H) Member Services and Utilization | I) Provider Services - Quality of Care | J) Provider's Complaints - Prompt Pay | K) Miscellaneous |
|---|------------------|------------------|----------------------|--------------------------------|-----------------------------------|-------------------------------|---|-----------------|------------------------|----------------------|------------------------------------|--|---------------------------------------|------------------|
| AETNA HEALTH OF ILLINOIS                | 52,255           | 1,436            | 20                   | 10                             | 4                                 | 0                             | 3   | 0               | 0                      | 1,279                | 33                                 | 55                                     | 52                                    | 0                |
| CIGNA HEALTHCARE OF ILLINOIS INC        | 2,127            | 74               | 2                    | 6                              | 3                                 | 43                            | 2   | 2               | 0                      | 7                    | 2                                  | 0                                      | 0                                     | 9                |
| CIGNA HEALTHCARE OF ST LOUIS INC        | 476              | 13               | 0                    | 5                              | 0                                 | 5                             | 0   | 0               | 0                      | 0                    | 0                                  | 0                                      | 1                                     | 2                |
| GREAT-WEST HEALTHCARE OF ILLINOIS       | 2,401            | 0                | 2                    | 0                              | 0                                 | 0                             | 0   | 0               | 0                      | 0                    | 0                                  | 0                                      | 0                                     | 0                |
| GROUP HEALTH PLAN INC                   | 17,546           | 7                | 7                    | 0                              | 0                                 | 0                             | 0   | 0               | 0                      | 6                    | 0                                  | 0                                      | 0                                     | 1                |
| HEALTH ALLIANCE MEDICAL PLANS INC       | 127,114          | 359              | 35                   | 78                             | 10                                | 25                            | 0   | 1               | 1                      | 240                  | 0                                  | 0                                      | 1                                     | 3                |
| HEALTH ALLIANCE MIDWEST INC             | 201              | 0                | 0                    | 0                              | 0                                 | 0                             | 0   | 0               | 0                      | 0                    | 0                                  | 0                                      | 0                                     | 0                |
| HEALTH CARE SERVICE CORP MUT LEG RES CO | 695,248          | 405              | 190                  | 36                             | 0                                 | 26                            | 1   | 0               | 0                      | 262                  | 11                                 | 3                                      | 64                                    | 2                |
| HMO MISSOURI INC                        | 0                | 0                | 0                    | 0                              | 0                                 | 0                             | 0   | 0               | 0                      | 0                    | 0                                  | 0                                      | 0                                     | 0                |
| HUMANA HEALTH PLAN INC                  | 40,102           | 514              | 50                   | 99                             | 3                                 | 18                            | 1   | 0               | 1                      | 383                  | 9                                  | 0                                      | 0                                     | 0                |
| MEDICAL ASSOCIATES HEALTH PLAN INC      | 2,169            | 7                | 0                    | 0                              | 0                                 | 0                             | 0   | 0               | 0                      | 0                    | 0                                  | 2                                      | 0                                     | 5                |
| MERCY HEALTH PLANS OF MISSOURI INC      | 1,835            | 6                | 1                    | 1                              | 0                                 | 0                             | 1   | 0               | 0                      | 3                    | 0                                  | 1                                      | 0                                     | 0                |
| NEVADACARE INC                          | 18               | 15               | 1                    | 0                              | 0                                 | 2                             | 0   | 0               | 0                      | 5                    | 0                                  | 0                                      | 3                                     | 5                |
| OSF HEALTH PLANS INC                    | 33,901           | 153              | 10                   | 70                             | 1                                 | 12                            | 9   | 0               | 0                      | 49                   | 0                                  | 0                                      | 0                                     | 12               |
| PERSONALCARE INSURANCE OF ILLINOIS INC  | 45,191           | 407              | 42                   | 125                            | 43                                | 20                            | 0   | 1               | 0                      | 211                  | 0                                  | 2                                      | 5                                     | 0                |
| UNICARE HEALTH PLANS OF THE MIDWEST INC | 98,188           | 350              | 26                   | 81                             | 6                                 | 0                             | 2   | 0               | 0                      | 249                  | 3                                  | 9                                      | 0                                     | 0                |
| UNION HEALTH SERVICE INC                | 22               | 21               | 0                    | 0                              | 0                                 | 1                             | 0   | 0               | 0                      | 4                    | 6                                  | 10                                     | 0                                     | 0                |
| UNITED HEALTHCARE OF ILLINOIS INC       | 17,605           | 191              | 26                   | 10                             | 0                                 | 0                             | 3   | 0               | 1                      | 147                  | 9                                  | 2                                      | 11                                    | 8                |
| UNITED HEALTHCARE OF THE MIDWEST INC    | 248              | 13               | 1                    | 2                              | 0                                 | 0                             | 0   | 0               | 0                      | 10                   | 0                                  | 0                                      | 1                                     | 0                |
| UNITEDHEALTHCARE PLAN OF THE RIVERVALLE | 13,889           | 98               | 10                   | 10                             | 0                                 | 6                             | 0   | 0               | 0                      | 75                   | 0                                  | 4                                      | 0                                     | 3                |
| <b>TOTALS</b>                           | <b>1,150,536</b> | <b>4,069</b>     | <b>423</b>           | <b>533</b>                     | <b>70</b>                         | <b>158</b>                    | <b>22</b>                                   | <b>4</b>        | <b>3</b>               | <b>2,930</b>         | <b>73</b>                          | <b>88</b>                              | <b>138</b>                            | <b>50</b>        |

As of: December 31, 2007

Source: Illinois Department of Financial and Professional Regulation - Division of Insurance

Published: Wednesday, June 11, 2008

HMO External Independent Review Summary 2007

Disposition of  
External Reviews

| Company Name                       | HCP Enrollment   | Total Complaints | Total DOI Complaints | Complaints with External Review | A) Relief Granted | B) Partial Relief | C) Information Furnished | D) No Relief Granted |
|------------------------------------|------------------|------------------|----------------------|---------------------------------|-------------------|-------------------|--------------------------|----------------------|
| AETNA HEALTH OF ILLINOIS           | 52,255           | 1,436            | 20                   | 2                               | 0                 | 0                 | 0                        | 2                    |
| CIGNA HEALTHCARE OF ILLINOIS INC   | 2,127            | 74               | 2                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| CIGNA HEALTHCARE OF ST LOUIS INC   | 476              | 13               | 0                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| GREAT-WEST HEALTHCARE OF ILLINOIS  | 2,401            | 0                | 2                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| GROUP HEALTH PLAN INC              | 17,546           | 7                | 7                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| HEALTH ALLIANCE MEDICAL PLANS INC  | 127,114          | 359              | 35                   | 23                              | 6                 | 0                 | 1                        | 16                   |
| HEALTH ALLIANCE MIDWEST INC        | 201              | 0                | 0                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| HEALTH CARE SERVICE CORP MUT LEG   | 695,248          | 405              | 190                  | 0                               | 0                 | 0                 | 0                        | 0                    |
| HMO MISSOURI INC                   | 0                | 0                | 0                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| HUMANA HEALTH PLAN INC             | 40,102           | 514              | 50                   | 1                               | 1                 | 0                 | 0                        | 0                    |
| MEDICAL ASSOCIATES HEALTH PLAN INC | 2,169            | 7                | 0                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| MERCY HEALTH PLANS OF MISSOURI INC | 1,835            | 6                | 1                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| NEVADACARE INC                     | 18               | 15               | 1                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| OSF HEALTH PLANS INC               | 33,901           | 153              | 10                   | 0                               | 0                 | 0                 | 0                        | 0                    |
| PERSONALCARE INSURANCE OF ILLINOI  | 45,191           | 407              | 42                   | 27                              | 3                 | 0                 | 0                        | 24                   |
| UNICARE HEALTH PLANS OF THE MIDWE  | 98,188           | 350              | 26                   | 12                              | 4                 | 0                 | 0                        | 8                    |
| UNION HEALTH SERVICE INC           | 22               | 21               | 0                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| UNITED HEALTHCARE OF ILLINOIS INC  | 17,605           | 191              | 26                   | 0                               | 0                 | 0                 | 0                        | 0                    |
| UNITED HEALTHCARE OF THE MIDWEST I | 248              | 13               | 1                    | 0                               | 0                 | 0                 | 0                        | 0                    |
| UNITEDHEALTHCARE PLAN OF THE RIVE  | 13,889           | 98               | 10                   | 4                               | 0                 | 1                 | 0                        | 3                    |
| <b>TOTALS</b>                      | <b>1,150,536</b> | <b>4,069</b>     | <b>423</b>           | <b>69</b>                       | <b>14</b>         | <b>1</b>          | <b>1</b>                 | <b>53</b>            |

As of: December 31, 2007

Source: Illinois Department of Financial and Professional Regulation - Division of Insurance

Published: Wednesday, June 11, 2008