



AMERICAN ACADEMY *of* ACTUARIES

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February 1, 2021

Norris Cochran
Acting Secretary
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Ave., SW
Washington, DC 20201

Dear Acting Secretary Cochran:

On behalf of the American Academy of Actuaries (Academy),¹ I am pleased to recommend Ms. Annette V. James, MAAA, FSA, to you as a candidate for appointment to the COVID-19 Health Equity Task Force pursuant to Section 2 of President Biden's Executive Order (Executive Order 13995), *Ensuring an Equitable Pandemic Response and Recovery*, dated January 21, 2021.

The Academy is the nonpartisan public policy and professionalism organization representing actuaries in all areas of practice in the United States. The Task Force would benefit greatly from the perspective of an actuary, familiar with the complexities of health insurance coverage, including the potential for and limitations of data and algorithms used for different purposes.

Based on her distinguished career as a state regulatory health actuary and consulting actuary, her extensive efforts on behalf of the actuarial profession—especially her leadership on health equity issues, and her personal experiences with bias in the health system as a person of color—Ms. James is particularly well qualified for membership on the Task Force.

Ms. James has devoted many years to public service, serving as Lead Actuary for the Nevada Division of Insurance for 14 years (2006–2020), where she was a key member of a multiagency task force charged with implementing the Affordable Care Act (ACA) in Nevada and led Nevada's review of options to stabilize the ACA market. She is currently a Principal with NovaRest Actuarial Consulting, an actuarial consulting firm that focuses primarily on providing health actuarial services to state and federal agencies.

In addition to her roles as a regulatory and consulting actuary, Ms. James has devoted many years of service to maintaining high professional standards of actuarial qualification, practice, and conduct. She currently chairs the Academy's Health Equity Work Group (HEWG), which was established to study health equity, assess whether actuarial practice may be perpetuating or

¹ The American Academy of Actuaries is a 19,500-member professional association whose mission is to serve the public and the U.S. actuarial profession. For more than 50 years, the Academy has assisted public policymakers on all levels by providing leadership, objective expertise, and actuarial advice on risk and financial security issues. The Academy also sets qualification, practice, and professionalism standards for actuaries in the United States.

contributing to health disparities, and facilitate solutions to health disparities. The HEWG is exploring how health inequity may be a quantifiable risk that is currently not recognized or measured. The HEWG is also examining the many ways in which data and algorithms are used in the health care and health insurance systems and assessing the appropriateness of their use. As part of this analysis, the HEWG will be analyzing the concerns over using proxy data when actual data are not readily available. Understanding the nature, limitations, and bias in data in general, and proxy data in particular, and making appropriate adjustments may facilitate the effective mitigation or elimination of bias when actual data is not available. A summary of the HEWG's charge and initial activities are described in recent comments to the National Association of Insurance Commissioners.²

Ms. James also served for six years (2015–2020) as a member of the Health Committee of the Actuarial Standards Board, which sets standards for appropriate actuarial practice in the United States through the development and promulgation of Actuarial Standards of Practice (ASOPs). These ASOPs describe the procedures an actuary should follow when performing actuarial services and identify what the actuary should disclose when communicating the results of those services. She has also served on Academy committees and work groups focused on various aspects of health care as well as on leadership committees of other actuarial organizations addressing the conduct of the organization's membership. Ms. James is a well-respected speaker on topics relating to health insurance, regulation and professionalism and has authored professional articles on topics ranging from the ACA to the future of insurance. While a regulator, Ms. James provided expert testimony at the Nevada state legislature and represented the state on various committees of the National Association of Insurance Commissioners.

The Task Force would benefit greatly from the combination of Ms. James' expertise as an actuary with health insurance, regulatory and consulting experience, her commitment to public service, and her lived experience as an immigrant and person of color navigating the health care system on behalf of herself and family members. On behalf of the American Academy of Actuaries, I highly recommend her as a candidate for appointment to the Task Force.

Contact information:

Ms. Annette V. James, NovaRest Actuarial Consulting, (775) 622-8365 (o), (775) 343-2322 (m), Annette@NovaRest.com.

Thank you for your consideration.

Sincerely,



Thomas A. Campbell, MAAA, FSA, CERA
President
American Academy of Actuaries

² Annette James, Comments to the National Association of Insurance Commissioners Special (EX) Committee on Race and Insurance, Workstream 5. December 2, 2020. Available at: https://www.actuary.org/sites/default/files/2020-12/Academy_HEWG_Comments_to_NAIC_Race_and_Insurance.pdf