



April 12, 2021

VIA ELECTRONIC MAIL

Chlora Lindley-Myers  
Director, Missouri Department of Commerce and Insurance  
301 West High Street  
Room 530  
Jefferson City, MO 65101

**RE: No-Action Letter Request**

Dear Director Lindley-Myers:

CVS Health is committed to building the strongest consumer-focused health company in America. We are working actively to improve consumer access to care, tools, and services to maintain optimal health. Our enterprise is committed to the vision of more convenient and lower-cost access to health services that meet people where they are on their health care journey. As such, Aetna would like to participate in the Missouri individual market starting in January of 2022.

Aetna requests to be allowed to reenter the individual market using our Aetna Life Insurance Company (ALIC) license, as allowed through Department discretion outlined in RSMo. §374.018. Specifically, we request that the Department issue a No-Action Letter regarding Aetna's individual market reentry and corresponding enforcement of RSMo. §376.454(4)(2), which prohibits insurers from selling individual market policies within five years after withdrawing from the individual market. ALIC last offered individual market policies in 2017 and the five-year period considered in RSMo. §376.454(4)(2) does not conclude until the end of 2022.

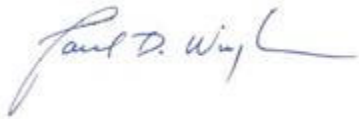
Using the Department's discretion to allow Aetna's reentry is warranted by several factors, including first and foremost, increased competition and consumer choice for Missourians. Increased competition in insurance markets helps drive premium affordability. The Department's longstanding efforts to increase affordability are appreciated, and Aetna's reentry will help ensure greater financial stability for Missourians through the benefit of increased competition. Additionally, and equally important, additional competition drives continual innovation in plan designs that provide consumers with more options to meet individual healthcare needs. By leveraging the various assets of CVS Health, including health care benefits, pharmacy services, and retail settings, Aetna is well positioned to put the consumer at the center of their own healthcare experience. Given our strong enterprise presence already in place across Missouri – over 300k Aetna members, over 350 pharmacies, and 27 MinuteClinics – the individual market provides a great opportunity to expand our presence further to meet the needs of Missourians through a consumer-centered product offering.

Department leadership clearly recognizes the consumer benefits outlined above and has consistently inquired about Aetna's reentry into the individual market since 2017. We stand ready to commit to the state moving forward in 2022, with our consumer-driven mission exemplified through innovative individual market products that Missourians deserve. Thank you for considering the discretion afforded the Department under RSMo. §374.018 and allowing Aetna to offer individual market policies starting in January of 2022.

Sincerely,

A handwritten signature in cursive script that reads "Michael Portnoy".

Michael Portnoy  
Regional General Counsel, Aetna

A handwritten signature in cursive script that reads "Paul D. Wingle".

Paul Wingle  
Vice President Consumer Solutions, Aetna

cc: Amy Hoyt  
Stewart Freilich