



May 26, 2010

Craig Dixon
Bureau Chief
Department of Insurance
Field Claims Bureau
45 Fremont St, 22nd Floor
San Francisco, Ca 94105

Dear Mr. Dixon,

Thank you for the opportunity to respond to the recent Field Claims Examination Report performed for the period December 1, 2006 through November 30, 2007.

We request that this response letter be attached to and made a part of the final examination report.

As stated in your report, we understand this examination does not present a comprehensive overview of our practices. As an example, it does not encompass our company's mission and vision of "People Helping People", confirm our "top-down" commitment to serving our Plan Holders, or evaluate the high quality level of service that we provide overall as evidenced by our satisfied customer base and subsequent renewal rate. We understand and agree that it merely provides a snapshot, for specifically identified claims, initiated during the review period, to determine adherence to Fair Claims Settlement Practices Regulations (FCSPR).

As we mentioned during the Examination, the CDI audited our claim practices for the period ending September 2001 and found us to be fully compliant. Since then, our processes and procedures have not changed substantially (other than those required by the recent changes in the FCSPR).

As a result of the latest CDI Examination findings, we understand that our practices need slight enhancements to fully comply with the intentions of these new guidelines. We take sincere pride in the organization we've built, the care we give, and the service we provide to our Plan Holders, and therefore every effort and needed change has been implemented to ensure our customers are served to the best of our ability and in full accordance with the FCSPR.

To Recap our corrective action:

ORHP has implemented enhanced processes and procedures to ensure that denial letters containing accurate and specific policy wording are sent in every instance as required by the FCSPR, in the time line required, including in those instances where no malfunction is found.

ORHP has implemented specific processes and procedures to ensure that for all claims placed, necessary follow up is performed at the required intervals, or as committed to the Plan Holder.

ORHP has implemented a process to maintain all work papers according to the time lines indicated in the FCSPR.

ORHP has implemented a process that will ensure that the work orders contain record of the actual date of service.

ORHP has implemented enhanced procedures to review every claim denial to confirm appropriate coverage is provided to our Plan Holders.

We sincerely value the trust our Plan Holders have placed in us. Our goal has always been to provide high quality service and comprehensive coverage at a fair and reasonable cost. As the CDI examiners are well aware, there are many moving parts to the service process. Therefore, we remain intimately connected to balancing the level of service that we provide with the cost of that service, ensuring that our Plan Holders receive "perfect" service whenever possible, and "excellence" in service at a minimum. And I think our Plan Holders would most assuredly agree that during our interactions with them, we are sincere in our efforts to meet their needs and provide them with service "second to none".

In the event you have any further questions, comments or concerns, please do not hesitate to contact me directly.

Respectfully,

A handwritten signature in blue ink that reads "Gwen Gallagher". The signature is written in a cursive, flowing style.

Gwen Gallagher
President