



Aetna
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Lucinda Casillas
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February 12, 2013

California Department of Insurance
Towanda David, Bureau Chief
Field Claims Bureau
300 SOUTH SPRING STREET 11TH FLOOR
LOS ANGELES, CA 90013

RE: Field Claims Examination Report
AETNA LIFE INSURANCE COMPANY, NAIC # 60054

Dear Ms. David:

Aetna Life Insurance Company (the Company) is submitting comments to the above referenced examination and the California Department of Insurance's (the Department) Examination report sent under your cover letter received by Aetna Life Insurance Company (the Company) on January 22, 2013. The report covers an examination of the Company's claim practices specific to claim denials for services rendered to members with an Autism Spectrum Disorder diagnosis during the time period of June 1, 2008 through March 31, 2011.

The Company feels it is important to note that the claims examined were processed prior to the Company's implementation of CA Senate Bill 946. This bill added language to Insurance Code §§ 10144.51 and 10144.52 which specified how carriers should cover services related to the treatment of Autism. The Company would also like to point out that it implemented the new law in December of 2011, prior to the mandated date of July 2012. Prior to December of 2011 the Company believed, and still believes, that our plan benefits, policies and procedures were in compliance with mental health parity laws.

The Company would also like to offer new information for issue number 11 which is discussed in the report on pages 28 and 29. Since our response to the Preliminary report, dated August 30, 2012, we discovered an alternate storage area and a method to recreate copies of the plan documents. We provided copies of the documents that were missing during the exam to the field examiners under separate cover. The Company now has two methods of providing a requesting party with duplicates of what our member received upon enrollment and will ensure that we can produce said copies consistently and promptly upon request in the future.

Sincerely,

A handwritten signature in cursive script that reads "Lucinda Casillas".

Lucinda Casillas
Regulatory Compliance Director
casillaslv@aetna.com

cc: Paula Pinelli, Supervising Insurance Compliance Officer
Nancy Shimer, Senior Insurance Compliance Officer