



December 30, 2021

Richard J. Pollack, President and Chief Executive Officer
American Hospital Association
800 10th Street, NW
Two CityCenter, Suite 400
Washington, D.C. 20001-4956

Re: Emergency Health Care Services and Urgent Care Center Services Coverage Determination Guideline

Dear Mr. Pollack:

I am responding to your letter dated December 29, 2021, regarding recent revisions to UnitedHealthcare's Emergency Health Care Services and Urgent Care Center Services Coverage Determination Guideline (CDG). We want to reassure you that consistent with our prior communication in June 2021, UnitedHealthcare is not implementing any new policy regarding coverage criteria for emergency level care on January 1, 2022.

Because the CDG available on our website was posted prior to federal guidance being issued that clarified the prudent layperson standard (86 Federal Register 36872 (Sept. 13, 2021)), we updated the CDG to comply with that guidance and clarify certain terms in our benefit coverage documents. Unfortunately, as your letter suggests, our intention to align coverage definitions with the new guidance created confusion rather than clarifying matters. To reiterate, there is no new policy regarding coverage criteria for emergency care being implemented on January 1, 2022. Further, UnitedHealthcare has no intention of implementing any such new policy for its fully insured business. From your letter, it is clear that our attempt to clarify resulted in confusion, and we are using your feedback to be clearer regarding our intent. To this end, we are updating the CDG to remove the language added in the December Bulletin as well as language that was added earlier in 2021 regarding coverage criteria for emergency services.

We appreciate your bringing your concern to our attention and are happy to schedule time to further discuss any additional questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brian R. Thompson'.

Brian R. Thompson
Chief Executive Officer, UnitedHealthcare