We appreciate the opportunity to participate in the B Committee’s Model Law Review initiative process. We concur in the staff recommendation that each of the five model laws and recommendations currently under review be retained.

The Discount Medical Plan Organization Model Act (number 98) should be retained as a model act and updated to recognize new issues raised by the Affordable Care Act. Discount medical plans continue to be widely available and the danger of deceptive practices by these plans continues to be a serious problem, as evidenced by a recent $1.3 million settlement involving discount plans in Massachusetts. [http://www.mass.gov/ago/news-and-updates/press-releases/2014/2014-08-28-gtl-vas.html](http://www.mass.gov/ago/news-and-updates/press-releases/2014/2014-08-28-gtl-vas.html). Model Act 98 should be updated to clarify that discount medical plans cannot be used to meet the ACA’s essential health benefit or actuarial value requirements and to require prominent disclosure by discount plans that they do not provide minimum essential benefit requirements for purposes of the ACA’s shared responsibility requirement.

We recommend that the NAIC Model Act (#640) and Model Regulation (#641) for Long Term Care Insurance be retained. The Models provide some national consistency and important guidance to states in regard to standards for rates and form filings, benefits, applications, outlines of coverage, notices, disclosures, and various consumer protections. These Models also serve as a foundation for standards used by the IIPRC to approve long term care insurance filings in member states.

We also urge that the Prevention of Illegal Multiple Employer Welfare Arrangements (MEWAs) and Other Illegal Health Insurers Model Regulation (220) be retained. The continuing threat of illegal MEWAs is evidenced by ACA provisions (sections 6604, 6605, and 6606) strengthening state and federal oversight of fraudulent MEWAs.

Finally, we ask that the Health Policy Rate and Form Filing Model (Act) (Regulation) (#165) be retained. Although few states have taken action on the Model to date, fostering a uniform standard for processing rate and form filings is a worthy goal, and could help contribute to making the filing process simpler and more transparent for all stakeholders.