October 14, 2014

Ms. Tanji Northrup
Utah Insurance Department
Chair, NAIC Model Law Review Initiative (B) Subgroup
c/o National Association of Insurance Commissioners (NAIC)
444 North Capitol Street, N.W., Suite 700
Washington, DC 20001

Attn: Jolie Matthews, NAIC Senior Health and Life Policy Counsel

RE: Comments on Model Act Review Initiative for Health Insurance and Managed Care (B) Committee

Dear Ms. Northrup,

The Florida Office of Insurance Regulation (“Office”) appreciates the opportunity to provide recommendations and comments on the five NAIC models assigned for review. If it is not too late, we have provided our comments relative to each model below.

Discount Medical Plan Organization Act (#98)

The Office believes this model has significant value; however, we are concerned that uniform enactment, as required by the model law development framework criteria, would be difficult. Therefore, it may be appropriate to retain the model act as a best practice guideline rather than as a model.

Health policy Rate and Form Filing Model [Act] [Regulation] (#165)

The Office believes this model should be archived. The model has not been adopted by any state and most states with activity did so by bulletin or notice.

Prevention of Illegal Multiple Employer Welfare Arrangements (MEWAs) and Other Illegal Health Insurers Model Regulation (#220)

The Office supports archiving this model regulation. The focus appears to be on reporting unauthorized MEWAs rather than specific guidelines for regulating MEWAs.
Long-Term Care Insurance Model Act (#640) & Long-Term Care Insurance Model Regulation (#641)

The Office supports retaining these models, as well as, supports the revisions recently adopted on model 641 by the Health Insurance and Managed Care (B) Committee.

We appreciate the efforts of the subgroup and we appreciate the opportunity to share the Office’s recommendations for these models.

Sincerely,

Rich Robleto

RR/ayh