



VIA EMAIL

October 23, 2009

Jane Sung  
Senior Health Policy Analyst and Council  
National Association of Insurance Commissioners

Re: September 22, 2009 Draft Revisions to Long Term Care Model Regulation Number 641

Dear Jane,

Thank you for the opportunity to comment on the proposed revisions to the Long Term Care Model Regulation.

Ohio has reviewed these proposed changes which the Senior Issues Task Force voted to adopt and expose for public comment on September 22, 2009, including:

- 1) Addition of in-force data by state and nationwide in the Appendix E reporting form;
- 2) Allowing carriers to report by claimant or by transaction in the Appendix E reporting form;
- 3) Clarification that a denial does not include a request for payment in excess of the contractual limits in the Appendix E reporting form; and
- 4) Deletion of a drafting note in the rule text, Section 15, which states the definition of claims denied used in the reporting form is for HIPAA reporting purposes only, not market conduct examinations or other regulatory issues,

Ohio has no objection to these revisions.

Best regards,

Mary Jo Hudson  
Director