From: Mitchell, Martin [mailto:mmitchell@ahip.org]
Sent: Thursday, March 19, 2015 3:32 PM
To: Wallace, Petra
Subject: NAIC Notice: Market Conduct Examination Standards (D) Working Group Revised Exposure Draft and Comments

Petra,

Further to our emails earlier this month, I would like to submit the following language for inclusion within the current exam standard under review by the Working Group.

Examiner Note: PHS Act section 2713 and the federal regulations permit student health insurance coverage to coordinate with student health centers to ensure the provision of preventive health services. For example, an issuer can arrange for a student health center to serve as its in-network provider where students could receive preventive services without cost-sharing.

Federal regulations also permit a student health insurance plan to designate providers at a student health center as its in-network providers, thus allowing students to choose from among the student health center's providers for purposes of satisfying section 2719A, provided that the center has sufficient provider capacity and range of services available to support this designation. Federal regulators believe that provider selection from an adequate health center provider panel provides an adequate incentive for students to obtain health care at the student health clinic while they are on campus, while also providing them with choice of providers when away from campus. Examiners are encouraged to review CMS–9981–F with regard to federal regulations pertaining to student health insurance coverage.

Hope this is ok with you.

Marty

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