

DISCUSSION POINTS FOR RFTF PROPOSED 1.F CHARGE CHANGE

- (1) Health sharing ministries and short-term health insurance policies ARE NOT excepted benefits.
- (2) Excepted benefits conditions are listed in federal statutory text since the 1996 HIPAA.
- (3) Excepted benefits are "excepted" because they are not comprehensive major medical insurance.
- (4) Excepted benefits cannot be offered and marketed as major medical insurance.
- (5) Issue is marketing by bad actors - brokers - has been a problem in the past.
- (6) NAIC's Improper Marketing of Health Insurance WG is bringing awareness of bad actors.
- (7) Federal FTC, DOJ, CMS, DOL, and state AG's and DOI have been prosecuting bad actors.

RECOMMENDATION

Retain the current text of 1.F. and ADD after "short-term, limited duration (STLDI) coverage":

“, health sharing ministry coverage, and coverage that is offered and marketed as a substitute for, or an alternative to, comprehensive major medical coverage.”

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