

**UnitedHealthcare’s Comments to Sections 1 through 5
of the Model Regulation to Implement the
Supplementary and Short-Term Health Insurance Minimum Standards Model Act**

Section 5 – Policy Definitions

General comment: add definition for “limited scope dental coverage” and “limited scope vision coverage”

Specific comment: suggest changing the wording in Section 5(A) – “Except as provided in this regulation, a supplementary or short-term health insurance policy delivered or issued for delivery to any person in this state and to which this regulation applies shall ~~contain-comply with the requirements included in the definitions respecting the matters~~ set forth below ~~that comply with the requirements of this section~~ if the policy contains one of the terms and/or definitions set forth below.”

Specific comment: Section 5(B) suggest keeping a definition for “accident,” specifically defining it as “means an unintended or unforeseeable event or occurrence, which occurs on or after the policy effective date and for which benefits are not excluded in the General Exclusions and Limitations section.”

Specific comment: Section 5(E) suggest changing the definition of “injury” – “‘Injury’ shall be defined as bodily injury resulting from an accident, ~~independent of disease or bodily injury,~~ which occurs while the coverage is in force. All injuries due to the same accident are deemed to be one injury.”

Specific comment: Section 5(M) suggest changing the definition of “sickness” – “Sickness” shall not be defined to be more restrictive than the following:

- (1) “Sickness means sickness or disease of an insured person that first manifests itself after the effective date of insurance and while the insurance is in force. Sickness does not include pregnancy, learning disabilities, attitudinal disorders or disciplinary problems.
- (2) A definition of sickness may provide for a probationary period that shall not exceed thirty (30) days from the effective date of the coverage of the insured person.”
- (3) A definition of sickness may provide that all sicknesses that exist at the same time and that are due to the same or related causes are considered to be one sickness.
- (4) The definition may also provide that if a sickness is due to causes that are the same as or related to the causes of a prior sickness, the sickness will be considered a continuation or recurrence of the prior sickness and not a separate sickness.
- (5) The definition may be further modified to exclude sickness or disease for which benefits are provided under a worker’s compensation, occupational disease, employers’ liability or similar law.

Commented [ZMK1]: We would also like to delete “from an accident” but since we did not submit this change by July 30th we are happy to submit it for the second round of comments.

Formatted: Numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.25" + Indent at: 0.5"