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October 18, 2024

Mary Kay Rodriguez, Chair
Market Conduct Annual Statement Other Health (D) Working Group
National Association of Insurance Commissioners
1101 K Street, N.W. Suite 650
Washington, DC 20005

Submitted via email to hmarsh@naic.org

RE: Request for Feedback on MCAS Other Health Blank

Dear Chair Rodriguez,

AHIP¹ appreciates the opportunity to provide feedback on the interrogatories from the Blank. Below are responses to questions and proposals from the MCAS SME group discussion held on October 9, 2024.

Responses to Proposed Interrogatories

Interrogatory #1 - Are you currently marketing these products in this jurisdiction?

For clarity – AHIP recommends a rewording of the interrogatory to:

*Are you currently **selling** these products in this jurisdiction?*

If the word “marketing” remains in Interrogatory #1, a definition of marketing should be included in the Data Call and Definitions or as an FAQ to provide further clarity for respondents.

Interrogatories #6 - #20 (Related to Associations)

The NAIC requested feedback on which groups should be excluded from the scope of “associations.” AHIP recommends that the NAIC continue to exclude employer groups from their Association/Trust definition.

¹ AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and coverage more affordable and accessible for everyone. Visit www.ahip.org to learn how working together, we are Guiding Greater Health.

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Inclusion of Accident Only, Specified Disease and Hospital/Other Indemnity Products

Lastly, during the discussion on October 9, stakeholders discussed how best to categorize accident only, specified disease, and other indemnity products across coverage types (Individual, Association, and Employer Group). AHIP respectfully asserts that currently these coverage types for Employer Groups do not cause confusion among customers. Supplemental benefits are sold to Employer Groups via brokers advocating for the Employer Groups' best interest, and the coverage is then presented to employees during open enrollment periods where they can ask questions and work with employee benefits professionals to understand the products being offered.

Thank you again for your consideration. Any questions on our responses should be directed to Owen Urech, Senior Policy Advisor at ourech@ahip.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Owen Urech', with a long, sweeping tail extending to the right.

Owen Urech
Senior Policy Advisor, Product Policy