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Via Email

June 23, 2023

Ms. Erica Weyhenmeyer
Chair, Market Conduct Annual Statement Blanks (D) Working Group
National Association of Insurance Commissioners

Ms. Rebecca Rebholz
Vice Chair, Market Conduct Annual Statement Blanks (D) Working Group
National Association of Insurance Commissioners

c/o [Teresa Cooper](#)

RE: Uniform Market Conduct Annual Statement Blank (MCAS) Filing Date for Health, “Other Health”, and Short-Term Limited Duration

Dear Ms. Weyhenmeyer and Ms. Rebholz:

The Health Industry Interested Parties (“HIIP”) group is comprised of single and multi-state licensed health insurers and administrators representing comprehensive major medical and managed care insurance carriers of all sizes located throughout the United States. In addition to comprehensive major medical, many members of the HIIP group also offer coverage of products covered under the “Other Health” MCAS and the STLD MCAS. On behalf of the HIIP group, we are writing to request that the Working Group consider adopting a uniform filing date for the Health, “Other Health”, and Short-Term Limited Duration (STLD) MCAS lines.

Currently, the filing deadlines for these three lines of MCAS are as follows:

- The Health MCAS filing deadline of May 31 was approved by the Plenary at the NAIC Spring 2023 National Meeting, effective in reporting year 2023.
- The initial STLD MCAS filing deadline is currently June 30, 2023, and is scheduled to revert to April 30 starting in reporting year 2024.
- The initial “Other Health” MCAS filing deadline is currently June 30, 2024, and is scheduled to revert to April 30 starting in reporting year 2025.

In July, 2022, AHIP and BCBSA, on behalf of the HIIP group, provided this working group a [presentation](#) on the manual and complex nature of the workflow process that health carriers

endure to produce MCAS reports. After much discussion with the working group, a fixed May 31 filing deadline was agreed upon for the health MCAS filing. Since the same systems and processes are used in producing the STLD and “Other Health” MCAS reports, the HIIP group respectively requests that all MCAS lines that are prepared by health carriers have the same fixed filing deadline of May 31.

On behalf of the Health Industry Interested Parties group, we appreciate your consideration of our request to create a uniform filing deadline of May 31 for Health, “Other Health,” and STLD. We would be happy to discuss this further with you, NAIC staff, and members of the MCAS Blanks Working Group should have any questions.

Sincerely,

Samantha Burns
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