

August 25, 2026

Submitted electronically via jtouschner@naic.org

Drafting Group 3 – Develop State-Defined Plans with Premium Reduction Targets
Health Care Affordability and Mitigation (B) Working Group
National Association of Insurance Commissioners (NAIC)
Attn: Joe Touschner, Senior Health Policy Advisor
Email: jtouschner@naic.org

RE: Comment on Drafting Group 3 – Develop State-Defined Plans with Premium Reduction Targets

Dear Drafting Group Members,

On behalf of Navitus Health Solutions, LLC (Navitus), thank you for the opportunity to submit comments on “Drafting Group 3 – Develop State-Defined Plans with Premium Reduction Targets.” Navitus is a transparent pass-through PBM formed more than two decades ago as an alternative to the traditional PBM model.

We serve clients across a wide range of health plan products including commercial/employer, small group, marketplace, Medicare, and Medicaid plans. We focus on removing high costs from the prescription pharmaceutical supply chain and making medications more accessible to the members we serve and the employers and plans that support them. Navitus is committed to advancing policies that promote clarity, transparency, and affordability in prescription drug benefits. It is with this focus that we appreciate your consideration of our comments.

We appreciate the working group calling attention to laws permitting carriers to offer “mandate-lite” products in Florida, Kansas, Louisiana and Texas. As working families grapple with staggering health care costs across the nation, these products offer a lifeline for a select group of consumers.

Legislatures across the country have passed a multitude of coverage requirements creating a market full of one-size-fits-some health insurance products. “Mandate-lite” products present an option for working families who need an affordable baseline level of coverage.

Should states follow the lead of their counterparts in offering mandate-lite products, we would call out the need for clear disclosure requirements that consumers must review and acknowledge before purchase. Florida, Kansas and Louisiana have taken this step to empower their constituents to make an informed decision when selecting a product that will meet their needs.

Looking forward, the state of Texas will consider a bill authorizing the use of these products in the state-regulated commercial market that may lower premiums by nearly 20%, saving Texas families about \$1,150 and small businesses over \$3,400 per employee per year. This initiative raises another item we would like to raise for awareness.

As the working group continues its overall discussion on “affordability,” we would recommend expanding the definition of affected parties to include employers. More than half of Americans receive their coverage through their employer. The average total premium cost for family coverage is \$27,000, with the employee paying roughly 20% ([What Your Employer-Based Health Coverage Really Costs | KFF](#)).

State insurance regulators have the duty of overseeing many of these commercial products which can be the only products of their nature available to smaller employers. Employers are paying for coverage that is becoming unaffordable and not necessarily what is best for their business and employees. Including employers in the working group’s definition of “affordability” will help members gain a broader perspective on a constituency that can be forgotten in such discussions but generally shoulders the majority of the costs. Small businesses make up 99.9% of the businesses in the United States and employ more than 62 million people ([Frequently Asked Questions About Small Business 2026 – Office of Advocacy](#)).

Small businesses wish to provide benefits to their employees but cannot always afford coverage that increases by double digits every year. Providing other options with full disclosure will help these small businesses that are integral to our community survive.

Thank you again for the opportunity to submit public comments.

Respectfully,

Matt Schafer
Director, Government Relations
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