



April 22, 2019

Nevada Division of Insurance
Attention: Susan Bell, Legal Secretary
1818 East College Parkway, Suite 3
Carson City, NV 89706

Dear Ms. Bell:

As the insurer for the AARP group Medicare supplement program, we appreciate and thank you for the opportunity to comment regarding Nevada's proposed regulation to adopt the amendments made to the NAIC Medicare Supplement Model Regulation ("NAIC Model").

Our only comment is as follows: In Section 3 and Section 4, there are new definitions added for "newly eligible before January 1, 2020" and "newly eligible on or after January 1, 2020" respectively. We believe this could cause confusion since the new NAIC Model Regulation defines "newly eligible" in the context of "newly eligible for Medicare on or after January 1, 2020" only and, as such, the term "newly eligible" is used as shorthand for people eligible for Medicare January 1, 2020 or later. To avoid confusion, we respectfully request that the Division remove the pre-1/1/2020 definition as unnecessary. We would suggest that references within the proposed regulation to individuals "newly eligible before January 1, 2020" could be revised to simply refer, as the NAIC Model does, to individuals eligible for Medicare before January 1, 2020.

Again, we appreciate the opportunity to review and comment on the proposed regulation, and hope our suggestions have been helpful. If you have any questions about our comments or would like to discuss anything concerning the comments or the proposed regulation, you are welcome to contact me by phone or email.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael F. Mann'.

Michael F Mann
Medicare & Retirement
Insurance Solutions - Regulatory Affairs
215-902-8469 /michael_f_mann@uhc.com