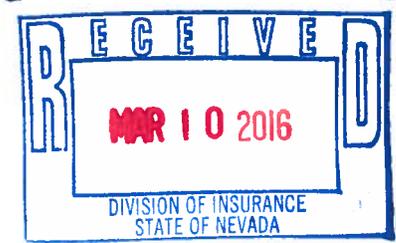


# Prominence<sup>SM</sup> Health Plan



Barbara D. Richardson  
Commissioner of Insurance  
Nevada Division of Insurance  
1818 East College Parkway #103  
Carson City, NV 89706

Dear Ms. Richardson,

This letter is in response to the Revised Proposed Regulation of the Commissioner of Insurance, LCB File No. R049-14, October 19, 2015 (updated by DOI on 2 March 2016).

Prominence Health Plan, in coordination with the Nevada Association of Health Plans (NVAHP), believes it is premature to adopt, as the DOI's final Regulation, the March 2 revised Network Adequacy regulation without further hearing. Our company respectfully requests that additional meetings be conducted to address ongoing concerns associated with the substantial and substantive changes listed in the Revised Proposed Regulation of the Commissioner of Insurance, LCB File No. R049-14, October 19, 2015 (updated by DOI on 2 March 2016).

In summary, Prominence Health Plan opposes the March 2, 2016 version of the Network Adequacy regulation; while the October 19, 2015 version is imperfect, it is far preferable to the most recent version of the proposed regulation. However, if the March 2, 2016 version is contemplated, then Prominence Health Plan urges the Commissioner to adopt changes proposed in the Nevada Association of Health Plans letter — specifically, reinsert deleted Sections 22 and 23 from the October 19 version; adopt versions of Sections 6 and 7 of the NAIC Health Plan Network Access and Adequacy Model Act; reinsert the deleted definitions; recognize telehealth as modality to meet network adequacy requirements; and insert additional content as illustrated in the NVAHP letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Heinze".

Scott Heinze  
Senior Director of Business Development and Government Affairs  
Prominence Health Plan