



President

Mike Murphy,
Anthem Blue Cross Blue
Shield

Secretary

Shirste Gessler,
Anthem Blue Cross Blue
Shield

Treasurer

Erin Russell,
United Healthcare

March 21, 2016

Nevada Division of Insurance
1818 East College Parkway, Suite 103
Carson City, NV 89706



RE: LCB File No. R049-14, October 19, 2015 (Updated by DOI on 17 March 2016)

Commissioner Barbara 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 17 March 2016).

The Nevada Association of Health Plans makes the following suggestions to the March 17 revision of the Regulation.

In Section 10 creating the Advisory Council consisting of nine persons with representation from carriers, providers and consumers. The Association recommends that no fewer than 4 members represent the carriers as they have the expertise and responsibility to build the networks and file the information that staggered term of 3 years be set; and, in the event of a vacancy, the vacancy be filled by someone from the same representation group.

In Section 13, delete the first sentence and insert in lieu thereof "At least once a month the provider directory must be updated to include each provider of health care who has left the network plan."

Section 14 sets 3 and 10 day timeframes in which to comply with a change in network plans. The Association believes these timeframes are not realistic and would suggest they be increased to 15 days and 30 days respectively.

The Association commends the Division for its hard work in trying to reach consensus on this very difficult issue of network adequacy and

Member Companies

- Aetna
- Anthem Blue Cross Blue Shield
- Hometown Health
- Prominence Health Plan
- United Healthcare
- Universal Health Services

looks forward to working with the Division and stakeholders as this concept continues to develop.

Sincerely,

A handwritten signature in blue ink that reads "Mike Murphy". The signature is written in a cursive style with a large, looping "M" and "y".

Mike Murphy, President

NEVADA ASSOCIATION OF HEALTH PLANS

March 18, 2016



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The Nevada Association of Health Plans makes the following suggestions to the March 17 revision of the Regulation.

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Respectfully submitted,