



Anthem Blue Cross and Blue Shield
9133 W Russell Road
Las Vegas, Nevada 89148

February 28, 2019

Barbara Richardson
Commissioner
Nevada Division of Insurance
1818 E College Parkway, Ste 103
Carson City, NV 89706



Re: LCB File R127-18 re: Stop-Loss Insurance
VIA Electronic email

Dear Commissioner Richardson:

We respectfully submit the following comments to the regulation LCB File No. R127-18 concerning stop loss insurance. We appreciate your consideration of the following amendments during the workshop scheduled to be held on March 4, 2019.

With respect to section 5 of the regulation, prior versions of the regulation required that the summary of relevant information (regarding effective dates, attachment points, terminal liability provisions, etc.) be included in the policy supplied to the policyholder. This makes perfect sense, as those terms are essential to the agreement and logically should be included in the policy. However, the latest version of the regulation requires that this information be included in a summary sheet and, presumably for each small or large group stop-loss policy issued, filed with the Commissioner on an annual basis. We, and we suspect other carriers and the Division itself, may find this to be problematic. It would inundate the Division with filings and potentially allow carriers to ask for and see what another carrier currently offers a group in premium and financial terms. Instead, we believe it would be productive and effective to have the stop-loss carrier file the policy form (as it does today) which would allow the Division to confirm that the policy has the requisite terms and information, without inviting an undue volume of submissions. If you agree, the revised regulation could read as (new text in red underline):

5. An insurer that issues a policy for stop-loss insurance shall submit to the Commissioner a template policy or template summary document which is not group-specific but which includes, without limitation, the following information:

- (a) The total premium or other consideration for the policy of stop-loss insurance;***
- (b) The effective date of the policy for stop-loss insurance, the date the policy of stop-loss insurance contractually ends and any renewability provisions;***
- (c) Both the specific attachment point and the aggregate attachment point;***
- (d) Any limitations on coverage that are included in the policy for stop-loss insurance;***
- (e) An explanation of the monthly accommodation and the disclosure of any features of the monthly accommodation that are included in the policy of stop-loss insurance;***
- (f) A description of terminal liability funding, including, without limitation, the cost of processing claims before and after the termination date, if any, of the policy of stop-loss insurance; and***
- (g) The maximum liability of the small employer for claims arising under the policy for stop-loss insurance.***

Respectfully,

Tracey A Woods
Senior Director, State Affairs