



March 18, 2019

TO: Insurance Commissioner Barbara Richardson
Nevada Division of Insurance
1818 College Parkway, Suite 103
Carson City, NV 89706

FROM: Michael F. Dillon, Jr., NV License #43075
Dillon Health , NV License #1762898
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Reno, NV 89501

A handwritten signature in blue ink, appearing to read "MTD", is positioned to the right of the "FROM" information.

RE: 15 employees limit on Proposed Stop Loss Regulation for Group Health Plans
LCB File No. R127-18

Dear Commissioner Richardson

I have been licensed in Nevada for over 20 years and Life and Health and have many clients who have level-funded insurance plans who this proposed regulation as written will impact negatively. I am licensed in every state in the country and have not seen a regulation on these. Please consider the following and if you feel there needs to be a limit, please lower the employee count to 5 employees.

- 1) There are existing policy holders this regulation would impact that I now of that have under 15 lives and have successful insurance programs for their employees.
- 2) The way in which these policies are written is that there will be no consumer threat to either the employee, the employees or their dependents. The stop-loss industry is highly regulated and will take on all risk.
- 3) There are no other states that have an employee minimum.
- 4) Most of the opposition is coming for fully insured carriers and agents who don't understand self-funding and don't want any competition. These products are not for everyone, but there is a definitely a market for employers who are willing to be more involved in their program.
- 5) I appreciate all the work that has been done by your staff and the LCB and believe all of the other changes to be great steps forward.
- 6) I did testify recently at the Life and Health Meeting held in Carson City to the same affect and was asked to submit my comments in writing.

Thank you for your consideration. If you have any questions, please contact me at mdillon@DillonHealth.com or at 775-560-7006.

CC: Annette James, Nick Stosic, Mark Garratt,



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