

From: [Adam Plain](#)
To: [Maile Campbell](#); [Glenn Shippey](#)
Cc: [Rhonda Kelly](#)
Subject: FW: SB393 Follow-up
Date: Tuesday, January 16, 2024 7:25:05 AM

Comments on SB 393 regulations.

Adam Plain CPCU, AIAF, AFSB, API, ARC, ARE

Insurance Regulation Liaison
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From: Paul Klein <paul@tri-strategies.com>
Sent: Friday, January 12, 2024 11:52 AM
To: Adam Plain <aplain@doi.nv.gov>
Cc: Edward Ableser <eddie@tri-strategies.com>
Subject: Re: SB393 Follow-up

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Adam, Thank you for the opportunity to participate in the regulations setting for [SB 393](#) regarding Medical Loss Ratio and reporting for Nevada's dental insurance providers and patients. The following is proposed by the Nevada Dental Association:

*Regarding **Sec.3.5.5 of SB 393** [On or before June 1 of each year, the Commissioner shall publish on an internet website maintained by the Division...],*

- 1. The public-facing content reporting the ratio of losses to premiums by each dental insurance provider is to: 1) be published and summarized in a manner that is easily located and identifiable to the public; and 2) be presented in "layman's terms", avoiding complex financial reporting and insurance industry jargon, so that it can be understood by the public at-large.**

Regarding **Sec. 3.5.7.(a) of SB 393** [The insurer, organization or person, as applicable, must submit to the Commissioner an adjusted rate filing...],

1. **The adjusted rate filing is to include a reimbursement or credit of premiums paid by customers affected by an excessive rate as defined by [NRS 686B.125](#).**

Regarding **Sec. 3.3 of SB 393**, which references NRS [695D.240.2](#) [The Commissioner may adopt regulations which define “marketing and administrative expenses..], for the purpose of determining ratio of losses to premiums as prescribed by SB393, “marketing and administrative expenses”

1. **Marketing and administrative expenses means a carrier’s financial administration expenses; marketing and sales expenses; distribution expenses, claims operations expenses; dental administration expenses; network operation expenses; charitable expenses; board, bureau or association fees; state and federal tax expenses, including assessments; payroll expenses; and other appropriate miscellaneous expenses.**

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Please let me know if there is anything I can provide to support these proposals.

Thank you,

Paul Klein

(775) 830-7285

Tri**Strategies**

Government Relations & Public Affairs

X [@PaulKlein](#)

LI [@KleinPaul](#)

On Fri, Dec 1, 2023 at 9:51 AM Adam Plain <aplain@doi.nv.gov> wrote:

Paul-

Thank you for your interest and reaching out to us proactively! The Division will be starting a regulation adoption process for Loss Ratios on dental plans pursuant to the requirements of SB 393 (2023), though I am not yet 100% sure what the timeline will be. We’re still in the early stages of planning out what we might propose or solicit comments on during a workshop. If you’d like to submit comments or ideas directly to me now, I can make sure they get routed to the proper people here at DOI or if you’d like to wait until the formal process starts with the workshop I can have you added to the notification/distribution list (if you’re not already on it).

Adam Plain CPCU, AIAF, AFSB, API, ARC, ARE

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From: Paul Klein <paul@tri-strategies.com>

Sent: Thursday, November 30, 2023 1:34 PM

To: Insurance Regulation <regs@doi.nv.gov>

Subject: Fwd: SB393 Follow-up