From: Odette Kattak

To: Insurance Regulation

Subject: Statutes; R122-24I

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Importance: High

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## Dear Nevada Legislature:

I'm writing to respectfully ask NV State Regulators to require carriers to provide more detailed and transparent information other than what is already provided in a DOI Report for groups under 100 FT Employees. Claims totals paid, premiums totals and headcounts do not provide a transparent picture of how a group is running. Employer groups should receive enough data to shop with other carriers. This limits a group and their employees' fair access to more affordable carrier options.

It would be helpful for the carrier to disclose claims that hit the specific stop loss. Also, most NV carriers carry their own Stop Loss premiums and do not shop Stop Loss from perhaps more affordable Stop Loss carriers. It's an unfair practice for the carrier to raise premiums based on their Stop Loss premiums when they "could" shop out for a more affordable premium. Carriers that choose to keep Stop-Loss in house can increase overall group premiums and unfairly pass these costs to group/employees.

Diagnosis and prognosis would also aid the other carriers by possibly providing a better view of risk. For example, if a prognosis is good an underwriter might be more inclined to quote said group. Also, it should be noted if care has ended. A one and done surgery for example.

Our goal is not to negatively impact HIPAA and PHI. We as advocates of members only seek more transparent risk data which may benefit quoting and Members at large.

As an industry professional in Nevada for over 20 years I've seen countless groups with -100 FT employees subject to having to renew with the same carrier at increased premiums year after year. This is caused when competing carrier underwriters are hesitant to release a competitive bid since claims data is limited.

Again, we all agree on the importance of protecting the member's privacy however, this should NOT come at the cost of limiting groups under 100 of transparent utilization data. Collectively we need to protect HIPAA as well as provide ALL carriers a fair opportunity to compete and ultimately for

members to have choices.
Respectfully,
Odette T. Kattak
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