

From: [Jack Childress](#)
To: [Jessica Colgan](#)
Subject: FW: Treatment of AHP's under Regulation R122-24
Date: Tuesday, November 26, 2024 2:03:38 PM
Attachments: image001.png

Jack Childress, APIR, PIR
Insurance Actuarial Analyst III
Nevada Division of Insurance
1818 College Parkway, Suite 103
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From: Alexis White <Alexis.White@hometownhealth.com>
Sent: Wednesday, November 20, 2024 10:35 AM
To: Jack Childress <jchildress@doi.nv.gov>
Subject: RE: Treatment of AHP's under Regulation R122-24

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning Jack,

Thank you for forwarding that meeting invite over. I may be attending in person, but if I can't make it in person will definitely attend virtually. Appreciate the information. Please see Hometown's response highlighted below.

If Hometown were required to provide claims experience to an individual small employer that is a member of an association health plan, we would use the small employer template. However, since the policy holder is the sponsoring association, this regulation does not apply to member employers as written (the small employer is not a policyholder, merely a member). We would be hesitant to provide reporting which our competitors are not also required to provide. Additionally, Hometown would be concerned with providing information on members who have claims in excess of \$25k for a commercial group with 50-99 lives as proposed in the attached claims report. Providing such information as a member's enrollment status, primary diagnosis, and status of the claim, will leave members vulnerable to having their PHI compromised. We have seen a troubling trend of brokers and employers attempting to identify high-cost members associated with their group plan. This is being done in order to move these to alternatives such as Medicaid or Medicare. Or worse, to remove these members via termination. Lowering the group employee threshold from 100+ to 50-99 lives will only make it easier for these members to be identified. Recommendation is keep this threshold at 100+ employees to protect the PHI and employment status of these members.

Thank you,



Alexis White | Product Development Coordinator
10315 Professional Circle, Reno, NV 89521

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From: Jack Childress <jchildress@doi.nv.gov>
Sent: Wednesday, November 20, 2024 10:30 AM
To: Alexis White <Alexis.White@hometownhealth.com>
Subject: RE: Treatment of AHP's under Regulation R122-24

CAUTION: External Email. THINK BEFORE YOU CLICK.

Hi Alexis,

I forwarded you the meeting invitation. The hearing will be in the hearing room of the Division if you want to attend in person. Please get your response to me this week though, so we have time to prepare our testimony.

Thank you,

Jack Childress, APIR, PIR
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From: Alexis White <Alexis.White@hometownhealth.com>
Sent: Tuesday, November 19, 2024 3:31 PM
To: Jack Childress <jchildress@doi.nv.gov>
Subject: RE: Treatment of AHP's under Regulation R122-24

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Good afternoon Jack,

I am still working internally with my team to get you a response to the below question.
Are you able to provide me the meeting time and location for the hearing on the 26th? Hometown

leadership would like me to attend.

Thank you,



Alexis White | Product Development Coordinator
10315 Professional Circle, Reno, NV 89521

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From: Jack Childress <jchildress@doi.nv.gov>
Sent: Thursday, November 14, 2024 10:44 AM
To: Jack Childress <jchildress@doi.nv.gov>
Subject: Treatment of AHP's under Regulation R122-24
Importance: High

CAUTION: External Email. THINK BEFORE YOU CLICK.

Good morning,

The regulation workshop for R122-24P was just held earlier this week. Since that time, a question has come up regarding which template within the attached spreadsheet would be filled out for an individual small group within an AHP requesting experience information for a renewal.

Please review and let me know how your insurance company would treat this.

Please respond by November 21st at the latest, as the regulation hearing is on November 26th.

Thank you,

Jack Childress, APIR, PIR
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