



July 8, 2020

Commissioner Barbara Richardson
Nevada Division of Insurance
1818 E. College Pkwy, Suite 103
Carson City, Nevada 89706

Dear Commissioner Richardson,

Physicians for Fair Coverage (PFC) commends you for your ongoing commitment to ensuring patients are able to affordably access quality health care from a trusted, in-network provider. When an insurer takes steps to significantly reduce reimbursements by terminating long standing physician agreements and narrowing their networks, our patients' ability to get the care and coverage they paid for and expect is threatened. This is especially true in the current global pandemic in terms of both COVID *and* non-COVID conditions.

PFC is a non-profit, non-partisan association of physicians from across the country, with hundreds of members in Nevada. Since 2016, we have been working diligently at both the state and federal levels – side by side with patient groups – to end surprise billing and maintain affordable access for our patients. Of note, our members across the country are in-network 90 – 98% of the time and willingly accept a ban on balance billing to take patients out of the middle and receive fair reimbursement from insurers. To date, our consensus work and model legislation, which is based on the very successful 2015 New York State law, has resulted in fair and balanced laws enacted in 6 states since 2019 – including here in Nevada - in an overwhelmingly bipartisan manner.

To truly ensure affordable access to care, we believe there must be robust insurance networks with limited out-of-pocket costs and cost-sharing requirements for our patients. To ensure adequate networks, standards should be enacted that include, but are not limited to:

- an adequate ratio of emergency physicians, hospital-based physicians, on-call specialists and subspecialists, as well as defined networks in geographic areas;
- transparent, up-to-date and easy-to-access information and policy disclosures for beneficiaries on the design of their insurer's plan and the plan's provider network;
- strong patient protections to prevent unfair discrimination based on health status;
- frequent auditing and regulatory monitoring to ensure compliance by insurers with established and measurable standards;
- public reporting of adequacy measures; and,
- enforcement of standards by the imposition of fines and penalties for violations.

Our physicians uniformly prefer to be in-network for all of their patients, 100 percent of the time, but struggle to do so without effective standards. Nevada now has the opportunity to establish strong, enforceable standards to better protect patients and their families and we hope the principles outlined here are helpful to you in advancing this effort.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele H. Kimball". The signature is fluid and cursive, with the first name being the most prominent.

Michele H. Kimball
President and CEO