



September 15, 2020

Representative Martin Carbaugh
200 W Washington St.
Indianapolis, IN 46204

Re: Comments on the National Conference of Insurance Legislators (NCOIL) Short Term Limited Duration Insurance Model Act

Dear Representative Carbaugh:

Thank you for the opportunity to provide comments on the NCOIL Short Term Limited Duration Insurance Model Act (Model Act). UnitedHealthcare (UHC) appreciates your support of short term limited duration insurance (STLDI) products and your work on the Model Act, and respectfully asks you to consider technical amendments to the Model Act outlined below.

Section 4. Definitions

As you know, short term health insurance is designed to help bridge gaps in an individual's health care coverage during times of transition. Therefore, in addition to STLDI products offered to be extended/renewed for up to 36 months, STLDI products are also offered to allow individuals to choose the length of time they want non-extendable/non-renewable STLDI coverage (from one month to just under 12 months in some states). Additionally, in order to ensure affordable options for individuals, STLDI products offer options for maximum dollar limits. These options coincide with the length of coverage to allow consumers to match their economic circumstances with their coverage.

In order to reflect the current STLDI market and options available to consumers, UHC suggests the following definition of "Short Term Insurance Plan":

"Short Term Insurance Plan" means a policy or certificate of accident and sickness insurance that:

(1) Provides either:

- a. No more than 12 months of nonextendable/nonrenewable coverage; or
- b. An initial term of coverage of not more than 364 days that may be extended or renewed by the covered person until the greater of:
 - i. Thirty-six (36) months; or
 - ii. The maximum period permitted under federal law; and

- (2) Offers for selection by an applicant/insured a maximum dollar limit for the total duration of coverage under the policy or certificate of two million dollars (\$2,000,000) in addition to other maximum dollar options.

Section 6. Coverage Requirements

UHC agrees with the coverage requirements outlined in the Model Act and suggests the following technical amendment to the language:

A short term insurance plan must include coverage, **subject to all terms, limitations and any applicable cost-sharing requirements of the plan**, for the following:

- (1) Ambulatory patient services;
- (2) Hospitalization;
- (3) Emergency services; and
- (4) Laboratory services

Section 8. Disclosure Requirements

UHC supports consumer education of STLDI products and ensuring applicants understand the coverage they are purchasing. In many cases, however, there may be more than one applicant for coverage (family coverage). Therefore, for administrative ease, UHC suggests the following amendment to Section 8 (b):

- (b) An insurer shall obtain the signature of **the primary** applicant to whom the disclosures required by subsection (a) are made.

Thank you in advance for your consideration of UHC's proposed amendments. If you have any questions or need additional information, please contact me at mollie_k_zito@uhc.com or (312) 453-0614. We look forward to the discussion of the Model Act on September 26th.

Sincerely,

Mollie K. Zito
Associate General Counsel
UnitedHealthcare Employer & Individual

Cc: Mr. William Melofchik
Mr. Richard Sullivan