



October 5, 2017

Assemblyman Kevin Cahill
Chair, Health, Long-Term Care & Health Retirement Issues Committee
National Conference of Insurance Legislators
2317 Route 34, Suite 2B,
Manasquan, New Jersey 08736

Representative Glen Mulready
Vice Chair, Health Long-Term Care and Health Retirement Issues Committee
National Conference of Insurance Legislators
2317 Route 34, Suite 2B,
Manasquan, New Jersey 08736

Re: NCOIL Draft Out-Of-Network Balance Billing Transparency Model Act

Dear Assemblyman Cahill and Representative Mulready:

On behalf of America's Health Insurance Plans (AHIP), we thank you for the opportunity to comment on the draft NCOIL Out-Of-Network Balance Billing Transparency Model Act.

We agree with you that out-of-network balance billing remains a significant problem for consumers and that the solution to this problem rests largely in increased transparency. We appreciate your efforts to achieve that goal and believe that this draft model represents a good first step. While we have recommended a number of amendments to the model described in the attached, we look forward to working with you and other NCOIL members and interested parties to reach consensus on a model that can be embraced by all stakeholders.

Rather than submitting comments in a letter separate from the text of the model bill, in the attached we offer amendments reflecting our recommendations on each page and the rationale/comments provided in footnotes for most. The rationale for the remainder of the suggested edits are largely self-explanatory.

October 5, 2017
Page two of two

Thank you in advance for your consideration of these comments. Should you have any questions regarding them, please do not hesitate to contact us at dbricker@ahip.org (22-861-6378) or bridgeway@ahip.org (501-333-2621). Thank you.

Regards,



Dianne Bricker
Senior Regional Director



Bob Ridgeway
Senior Government Relations Counsel

AHIP is the national association whose members provide coverage for health care and related services. Through these offerings, we improve and protect the health and financial security of consumers, families, businesses, communities and the nation. We are committed to market-based solutions and public-private partnerships that improve affordability, value, access, and well-being for consumers.