

# 3189

**Burke, Bridget**

**From:** Levins, Richard F. <Richard.Levins@ibx.com>  
**Sent:** Thursday, May 3, 2018 2:14 PM  
**To:** Burke, Bridget  
**Cc:** Frantz, Jodi (Insurance)  
**Subject:** RE: Proposed Updates to Medicare Supplement Insurance Regulations

Dear Ms Burke,

This follows my conversation today with Jodi Frantz. As a result of that conversation, I would like to withdraw my first comment below. Thank you for your consideration.

Sincerely,

**Richard F. Levins**  
 Vice President, Deputy General Counsel, and  
 General Counsel - PA Markets  
 1901 Market Street, 43rd Floor  
 Philadelphia, PA 19103  
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 richard.levins@ibx.com

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**Independence** 

**From:** Levins, Richard F.  
**Sent:** Tuesday, February 20, 2018 4:00 PM  
**To:** 'Burke, Bridget' <briburke@pa.gov>  
**Subject:** Proposed Updates to Medicare Supplement Insurance Regulations

Dear Ms Burke,

Below please see our comments to the above referenced proposed regulations.

- (1) We reviewed the NAIC Model Regulation versus the Department's Proposed Draft changes for the Medicare Supplement Benefit change Jan.1, 2020.
  - On page 2 in the Department's Proposed Draft section, We believe that "(b) *Prohibition of Medicare Part B Deductible plans*" section should actually be placed on page 1 in the "Medicare Part B Deductible" section. The section on page 1 as stated by NAIC deals directly to the Part B Deductible and that wording as designed by the Department on page 2 would fit better to page 1.

While not an issue to the Department's draft information, We read this "No Policy or Certificate can provide a Medicare Part B Deductible" to be ANY such Plan. Whether it is a NAIC Standard Form Plan OR a 65 Special plan it should apply to both.

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While not an issue to the Department's draft information, We read this "No Policy or Certificate can provide a Medicare Part B Deductible" to be ANY such Plan. Whether it is a NAIC Standard Form Plan OR a 65 Special plan it should apply to both.

- (2) As the Department has their proposed regulation changes, it would be helpful if the Department revises the Outline of Coverage sample for all Carriers to follow for 2020. They did the same for the last changes in 2010 and placed them on their website.

Thank you for the opportunity to submit comments.

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