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(as the working group's parent committee), would most likely face significant difficulties obtaining the 2/3 majority vote needed to pursue amendments to the model. With no additional regulatory oversight resulting from the amendments proposed, coupled with the fact the NAIC membership is currently within the three-year window to achieve national adoption of the changes to Model 880 that went into effect in the Spring of 2021, we believe the recommendations to Model 880 are not the best course of action at this time.

As the working group has only reviewed and discussed Model 880 to date, and the working group is tasked with reviewing existing NAIC Models and Guidelines that address the use of lead generators for sales of health insurance products and identify models and guidelines that need to be updated or developed to address current marketplace activities, the Department, in responding to the working group's most recent request for comments relative to the proposed revisions of Model 880, will be recommending the working group explore its second charge further by taking a comprehensive review of other models and guidelines that appear to warrant potential review. Such models include, but may not be limited to:

Model 218 -