





A few significant issues were raised and addressed during the drafting process. Those issues focused on: 1) the definition of "short-term, limited-duration insurance;" and 2) what specific information insurers must include in the notices provided to consumers purchasing hospital indemnity or other fixed indemnity insurance or short-term, limited-duration insurance. Specifically, regarding the definition of "short-term, limited-duration insurance," the Subgroup discussed whether the draft should reflect language in the final federal regulations defining the maximum duration of such coverage or whether to provide flexibility to the states to establish their own such provisions. After extended discussion, given the different requirements the states have with respect to the duration of short-term, limited-duration insurance coverage and the renewal of such coverage, the Subgroup decided to include in the revisions language in the definition of "short-term, limited-duration coverage," in proposed Section 3I, providing flexibility to the states to establish their own requirements related to such coverage. The Subgroup also added a drafting note for proposed Section 3I explaining its rationale. In its discussions related to the information insurers must include in the notices to be provided to consumers purchasing hospital indemnity or other fixed indemnity insurance or short-term, limited-duration insurance coverage, the Subgroup discussed how detailed the language should be with respect to distinguishing these types of coverage from major, medical insurance coverage and the ACA requirements. The Subgroup decided not to be too detailed in order avoid consumer confusion. The Subgroup decided to require insurers to include in the notices broad language noting these coverages are not required to comply with ACA requirements. In addition, the Subgroup decided to require that insurers include in the notice language advising consumers to check the policy to understand what it covers and does not cover as an additional measure to help ensure that consumers know what they are purchasing.

None.

The proposed revisions to Model #170 revise the title to "Supplementary and Short-Term Health Insurance Minimum Standards Model Act."

The proposed revisions to Model #170 revise this section for consistency with the substantive changes to the model, which remove provisions concerning the types of health insurance coverage subject to the requirements of the ACA.

The proposed revisions to Model #170 for this section clarify what types of health insurance coverage are subject to and not subject to its requirements.

The proposed revisions to Model #170 for this section add, revise and delete definitions to reflect the substantive changes made in the other sections of the model. The proposed revisions add new definitions for the terms: 1) hospital indemnity or other fixed indemnity insurance; 2) limited scope dental coverage; 3) limited scope vision coverage; 4) short-term, limited-duration insurance; and 5) supplementary and short-term health insurance. The proposed revisions revise and delete several definitions for consistency with the substantive changes to the model's provisions.

The proposed revisions to Model #170 for this section make a few revisions for consistency with the substantive revisions to the model. The proposed revisions also clarify a few of the standards for policy provisions related to terms of renewability or extensions of coverage and preexisting condition exclusions.

The proposed revisions to Model #170 revise this section for consistency with the substantive revisions to other sections in the model. For example, the proposed revisions delete references to the health insurance coverage subject to the ACA's requirements removed from the model. The proposed revisions also make a few non-substantive changes.

The proposed revisions to Model #170 revise this section for consistency with the substantive revisions to other sections in the model. The proposed revisions to this section also add new consumer notice requirements for hospital indemnity or other fixed indemnity insurance coverage and short-term, limited-duration insurance coverage.

The proposed revisions to Model #170 make no changes to this section.

The proposed revisions to Model #170 make no changes to this section.