## Project Authorized by What Charge and Date First Given to the Group

The Regulatory Framework Task Force has a general charge to: coordinate and develop the provision of technical assistance to the states regarding state level implementation issues raised by federal health legislation and regulations. The Task Force also has a sp(e)-3 (T)-38o2i2D.2 (b2 eo)-6.t (e)-3 (w)(o)-6.47b1uoa sp(er83)

that the exception was no longer relevant. The final draft of the model act deleted the specific exception for guaranteed issue for bona fide associations. However, this provision in the model act includes two drafting notes alerting the states to the controversy. The drafting notes highlight provisions contained in the proposed regulations issued by HHS, as published in the *Federal Register*, Nov. 26, 2012, which appear to require health carriers to offer plans to all individuals regardless of membership in a bona fide association. The drafting notes also suggest that, given these provisions, those states that have existing laws on this issue related to bona fide associations may wish to review that language and consider repealing it until HHS issues its final regulations and address the issue at that time.

The other significant issue the Task Force discussed and resolved during the drafting process concerned how to address, if at all, student health insurance coverage, which has been defined in federal regulations as a type of individual health insurance coverage. Initially, a draft of the model act had proposed not including student insurance coverage. Initially, a draft of the model act had proposed not including student insurance coverage. In the coverage is the coverage of the coverage in the coverage of the coverage is the coverage of the coverage is the coverage of the coverage o