STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES
MARGARET M. O'NEILL BUILDING
410 FEDERAL STREET, SUITE 1
DOVER, DE 19901

VOICE: (302) 739-3620
TTY/TDD: (302) 739-3699
FAX: (302) 739-6704

MEMORANDUM

DATE: August 29, 2011

TO: Ms. Rhonda West, Regulatory Specialist
              Delaware Department of Insurance

FROM: Daniese McMullin-Powell, Chairperson
              State Council for Persons with Disabilities

RE: 15 DE Reg. 164 [Dept. of Insurance Proposed Health Premium Consumer
              Comparison Regulation]

The State Council for Persons with Disabilities (SCPD) has reviewed the Department of
Insurance's proposal to adopt a regulation requiring State-licensed health insurers to respond to a
Department survey of rates/premiums on an annual basis. The Department will provide
hypothetical profiles of individuals and coverage levels. The insurers will have to provide their
rates for coverage applicable to the hypothetical individuals in a set format. The data will be
published on the Web and consumers will be able to submit a request for a quote directly on the
Web site. Non-compliance subjects the insurer to an administrative penalty (§9.0). The
proposed regulation was published as 15 DE Reg. 164 in the August 1, 2011 issue of the Register
of Regulations.

Since the regulation would facilitate consumer informed choice, SCPD strongly endorses it
subject to one caveat. Section 3.1 refers to "Insurers, Health Service Corporations and Managed
Care Organizations". The references to "Health Service Corporations and Managed Care
Organizations" may be redundant since the definition of "Insurer" in §2.0 includes health
services corporations and managed care organizations. The Department may wish to consider
revising §3.1.

Thank you for your consideration and please contact SCPD if you have any questions or comments
regarding our position or observations on the proposed regulation.

cc: Commissioner Karen Weldin Stewart
      Mr. Brian Hartman, Esq.
      Governor's Advisory Council for Exceptional Citizens
      Developmental Disabilities Council

15reg164 doi 8-11