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

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