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March 18, 2016

Commissioner Barbara Richardson
Nevada Division of Insurance
1818 East College Parkway, Suite 103
Carson City, NV 89706

RE: LCB File No. R049-14

Dear Commissioner Richardson:

The Nevada State Medical Association (NSMA), the Nevada Osteopathic Medical Association (NOMA) and our partner specialty medical societies submit these comments regarding the proposed regulation titled LCB File No. R049-14, relating to adequacy of network plans. The comments herein address the draft dated March 17, 2016, that was circulated with the Second Amended Notice of Intent to Act Upon Regulation and Hearing Agenda (the "March 17 draft").

We thank the Division of Insurance for its efforts in the promulgation of this regulation over the last two years. NSMA, NOMA and their partners have and will continue to be active participants in this regulatory process. Through our letters and testimony, we've established a clear record of our position relative to defining an adequate network and ensuring that those who issue coverage under your jurisdiction provide adequate networks to Nevada patients.

Although the March 17 draft does not address all of our concerns, NSMA, NOMA and their partner specialty medical societies view this draft as a very important step forward in this process. As such we support the March 17 draft as written. We are particularly supportive of the creation of the Council, as defined in Section 4 and established in Section 10, and of the provisions in Section 9 balancing the federal standards issued by the Centers for Medicare and Medicaid Services of the United States Department of Health and Human Services as a baseline with the potential need for additional or alternative recommendations made by the Council.

We also support the steps the Division has taken to ensure that the rule-making process is open and available for public comment.

With these critical pieces included in the regulation, we recommend passage of the March 17 draft. It is a step in the right direction on the vitally important topic of patient access to quality health care.

Thank you for your consideration.

Sincerely,

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Tomas Hinojosa, MD
President
Nevada State Medical Association

A handwritten signature in blue ink, appearing to read 'Veronica Sutherland, D.O.' in a cursive style.

Veronica Sutherland, DO
President
Nevada Osteopathic Medical Association

A handwritten signature in black ink, appearing to read 'AR' with a long horizontal stroke extending to the right.

Abdi Raissi, MD
President
Nevada Orthopaedic Society