***Regulatory Affairs***

**Antoinette Awuakye**

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TO: Cassie Soucy, Senior Policy Advisor

 Lisa Emerson, Senior Health Insurance Programs Analyst

DATE: December 3, 2021

RE: OR HB 3046 (2021) – Reporting Templates and Areas of Law That Would Benefit from Further Clarification in Rule

Thank you for the opportunity to participate in the Rules Advisory Committee (RAC) for HB 3046. You asked the Rule Advisory Committee (RAC) for feedback on (1) the NQTL Template to report on the NQTL information; (2) the draft DFR reporting template; and (3) other areas of the law which will benefit from further clarification in the next round of rulemaking.

**NQTL Template**

The NQTL Template that was attached to your November 16, 2021 email closely follows the Department of Labor’s (DOL) tool and guidance (FAQ). Therefore, we have no concerns with it as the form for carriers to use to report on the NQTL information. However, we strongly urge that the form remain consistent with federal requirements and guidance.

**Draft DFR Reporting Template**

We have no comments at this time but reserve the right to provide comments after the December 7, 2021 RAC meeting.

**Other Areas of the Law that Would Benefit from Further Clarification in Rule**

We have no comments at this time but reserve the right to provide comments after the December 7, 2021 RAC meeting.

Sincerely,

Antoinette Awuakye

Sr. Regulatory Affairs Specialist