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September 13, 2021

Interstate Insurance Product Regulation Commission  
444 North Capitol Street, NW  
Hall of the States Building  
Suite 700  
Washington, DC 20001

**RE: Proposed Options to Address Colorado’s Suicide Exclusion and Prohibition on Gender as a Rating Characteristic in the Long-Term Care Uniform Standards**

Members of the Product Standards Committee:

American Association of Health Insurance Plans (AHIP)<sup>1</sup> appreciate this opportunity to comment on the proposed amendments to the Compact’s Uniform Standards to address possible conflicts with Colorado’s one-year suicide exclusion and prohibition of gender as a rating characteristic for initial rate filings for long-term care insurance policies.

Since the establishment of the Compact, AHIP and our member companies have been strong supporters. The Compact allows consumers faster access to competitive and needed insurance products, promotes uniformity among the states through the development and application of uniform product standards, and provides a central point of filing for insurers.

While we appreciate that there are possibly conflicts between individual state standards and those of the Compact, the Compact was created because state insurance regulators recognized that there needed to be greater uniformity for these product standards. As such, we would encourage the Compact to maintain the current Uniform Standards. Each Compact Product Standard was established after intensive review and discussion by regulators, consumers and insurers. In addition, each Product Standard is reviewed and updated as needed at regular five year intervals to reflect both regulatory consensus and needs of the consumer marketplace. Amending the Uniform Standards to address state standards that vary from Compact Standards could negatively impact the underlying foundational tenants of the Compact. Lack of uniformity in the application of product standards by state, as well as the introduction of product variations, mitigates the Compact mission of providing a uniform regulatory framework as well as product uniformity nationally. Introducing possible ongoing regulatory uncertainty of how and when a

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<sup>1</sup> AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and coverage more affordable and accessible for everyone. Visit [www.ahip.org](http://www.ahip.org) to learn how working together, we are Guiding Greater Health.

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Compact product standard could be impacted by a state variation does not benefit the regulator, consumer or consumer community.

Thank you for the opportunity to provide these comments. AHIP looks forward to continued discussion in this matter as well as working with the Compact and its continued success.

Sincerely,



Ray Nelson  
Consulting Actuary, AHIP



Amanda Herrington  
Executive Director, AHIP