

SERFF Tracking Number: AENX-G127310862 State: Arkansas
Filing Company: Aetna Life Insurance Company State Tracking Number: 49238
Company Tracking Number: AR047690100014
TOI: H21 Health - Other Sub-TOI: H21.000 Health - Other
Product Name: 2011 RM- SRMP Plan N Informational Filing
Project Name/Number: 2011 RM- SRMP Plan N Informational Filing/AR047690100014

Filing at a Glance

Company: Aetna Life Insurance Company

Product Name: 2011 RM- SRMP Plan N
Informational Filing

TOI: H21 Health - Other

Sub-TOI: H21.000 Health - Other

Filing Type: Form

SERFF Tr Num: AENX-
G127310862

SERFF Status: Closed-Accepted
For Informational Purposes

Co Tr Num: AR047690100014

Author: SPI AetnaSPI

Date Submitted: 07/07/2011

State: Arkansas

State Tr Num: 49238

State Status: Filed-Closed

Reviewer(s): Rosalind Minor

Disposition Date: 07/08/2011

Disposition Status: Accepted For
Informational Purposes

Implementation Date:

Implementation Date Requested: On Approval

State Filing Description:

General Information

Project Name: 2011 RM- SRMP Plan N Informational Filing

Project Number: AR047690100014

Requested Filing Mode: Informational

Explanation for Combination/Other:

Submission Type: New Submission

Group Market Type: Employer

Filing Status Changed: 07/08/2011

State Status Changed: 07/08/2011

Created By: SPI AetnaSPI

Corresponding Filing Tracking Number:

PPACA: Not PPACA-Related

PPACA Notes: null

Filing Description:

For Informational purposes only.

Status of Filing in Domicile:

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Group

Group Market Size: Large

Overall Rate Impact:

Deemer Date:

Submitted By: SPI AetnaSPI

Company and Contact

Filing Contact Information

Sneha Venkatramani, Product & Regulatory

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Affairs Consultant

151 Farmington Avenue 860-273-8187 [Phone]
Mail Stop RW61 860-952-2069 [FAX]
Hartford, CT 06156

Filing Company Information

Aetna Life Insurance Company CoCode: 60054 State of Domicile: Connecticut
151 Farmington Avenue Group Code: 1 Company Type:
Hartford, CT 06156 Group Name: Aetna State ID Number:
(860) 273-7546 ext. [Phone] FEIN Number: 06-6033492

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Aetna Life Insurance Company	\$0.00	07/07/2011	

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Rosalind Minor Informational Purposes		07/08/2011	07/08/2011

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Disposition

Disposition Date: 07/08/2011

Implementation Date:

Status: Accepted For Informational Purposes

HHS Status: Not Reported

State Review: Reviewed-No Actuary

Comment:

Rate data does NOT apply to filing.

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification	Accepted for Informational Purposes	No
Supporting Document	Application	Accepted for Informational Purposes	No
Supporting Document	Health - Actuarial Justification	Accepted for Informational Purposes	No
Supporting Document	Outline of Coverage	Accepted for Informational Purposes	No
Supporting Document	PPACA Uniform Compliance Summary	Accepted for Informational Purposes	No
Supporting Document	Cover Letter	Accepted for Informational Purposes	Yes
Supporting Document	2009 - Cover letter	Accepted for Informational Purposes	Yes

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Supporting Document Schedules

		Item Status:	Status Date:
Bypassed - Item:	Flesch Certification	Accepted for Informational Purposes	07/08/2011
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Application	Accepted for Informational Purposes	07/08/2011
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Health - Actuarial Justification	Accepted for Informational Purposes	07/08/2011
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	Outline of Coverage	Accepted for Informational Purposes	07/08/2011
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Bypassed - Item:	PPACA Uniform Compliance Summary N/A	Accepted for Informational Purposes	07/08/2011

SERFF Tracking Number: AENX-G127310862 State: Arkansas
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Bypass Reason:

Comments:

	Item Status:	Status Date:
Satisfied - Item: Cover Letter	Accepted for Informational Purposes	07/08/2011

Comments:

Attachment:

AR_Informational Filing Letter FINAL.PDF

	Item Status:	Status Date:
Satisfied - Item: 2009 - Cover letter	Accepted for Informational Purposes	07/08/2011

Comments:

Attachment:

AR Coverletter.PDF



John W. Ciesielski
Product & Regulatory Approvals
Law and Regulatory Affairs
151 Farmington Ave, RW61
Hartford, CT 06156
(845) 279-1282
Fax: (860) 952-2065
Email: Ciesielskijw@aetna.com

July 7, 2011

Insurance Commissioner Julie Benafield Bowman
Compliance - Life and Health
Arkansas Department of Insurance
1200 West Third Street
Little Rock, AR 72201-1904

Subject: Aetna Life Insurance Company – NAIC 60054
Group Accident and Health
Booklet-Certificate Forms: GR-9N-GM 01-005 01 et. al.

Dear Ms. Benafield:

On March 18, 2009, Aetna Life Insurance Company submitted a filing to support a new product designed for retirees who have enrolled in Medicare Parts A and B for their primary health care coverage. Aetna's product helps cover certain out of pocket costs for services covered under Original Medicare, and, in some specific circumstances, helps cover certain services and supplies not covered under Medicare. Though this is not a Medicare Supplement health plan, the plan of benefits is very similar to those available in Medicare Supplement plans.

The Department approved our filing on March 25, 2009, under SERFF ID# AENX-126079802. A copy of the letter that accompanied our filing is attached for your reference. We want to let the Department know that as of August 7, 2011, we intend to market a plan similar to Medicare Supplement Plan N with our approved forms.

We have assessed our forms and the approved variable text and do not believe a filing is needed to support a Plan N offering. However, because Medicare Supplement Plan N was not available at the time of our original filing, we wanted to notify your Department of our intent to make this offering available to our customers.

If you have any questions, please do not hesitate to contact me at the address e-mail address or telephone number noted above. If you have any concerns, please let us know within the next 30 days. If the Department does not contact us within this time frame, we will consider our informational notice satisfactory.

Sincerely,

A handwritten signature in cursive script that reads "John W. Ciesielski".

John W. Ciesielski

Product & Regulatory Approvals
Law and Regulatory Affairs



Doreen M. Gatley
Product & Regulatory Approvals
Law & Regulatory Affairs
151 Farmington Ave., RE6A
Hartford, CT 06156
(860) 273-7848 or (800) 872-3862
Fax Number: 860-754-9278

GatleyD@aetna.com

March 18, 2009

Insurance Commissioner Julie Benafield Bowman
Compliance - Life and Health
Arkansas Department of Insurance
1200 West Third Street
Little Rock, AR 72201-1904

Subject: Aetna Life Insurance Company – NAIC 60054
Group Accident and Health
Booklet-Certificate Forms: GR-9N-GM 01-005 01 et. al.

Dear Ms. Benafield:

The attached group Booklet-Certificate forms are being submitted to your Department, for review and approval on a general use basis. Attachment A of this letter identifies each form that is enclosed. These forms are new and are not intended to replace any form currently on file with the Department. These forms are in final printed format and are neither drafts nor proofs.

The enclosed forms are intended to be used with Group Life, Accident and Health insurance policy form GR-29N approved by your Department on June 23, 2006.

On February 13, 2009, Mandana Shahvari Counsel for Aetna, and Gregg Martino, Head of State Government Relations of Aetna, met with Dan Honey, Deputy Commissioner to discuss the general concept of this new retiree group health product filing. As was explained to Mr. Honey, this new group health product will be offered to retirees and their eligible dependents who are enrolled in Medicare and the product will offer benefits that exactly mirror certain standardized Medigap plan designs (Group “Medigap” Type product). The purpose of our discussion with Mr. Honey was to confirm whether benefit mandates would be deemed to apply to this new Group Medigap Type product.

As a result of this discussion, Mr. Honey, suggested that we submit the filing for this new product to the Department (recognizing that Aetna would submit the product

without benefit mandates) along with information in support of our position that benefit mandates should not apply. Therefore, you will find that the enclosed filing does not include benefit mandates, pursuant to Arkansas §§23-79-801 through 804. We are submitting the analysis set forth below in support of this filing for further consideration by the Department.

Background

In response to discussions with several Aetna customers regarding health plans offered to their retirees, we are working to develop and file an employer group health product that can be offered to retirees enrolled in Medicare on a national basis with a simple, straightforward and affordable plan design. Standardized Medigap plan designs fulfill this market need. Medigap plan designs have been offered for many years, and were developed with the goal of improving Medicare beneficiary decision making by simplifying options and reducing confusion. Following the standardization of Medigap plans, consumers found it easier to compare products and prices and to choose the health benefits they needed at a known cost. Over the years, choosing a Medigap policy has become one of the easiest insurance decisions Medicare beneficiaries are required to make.

However, most states, including Arkansas, follow the NAIC Model Medicare Supplement Insurance Minimum Standards Model Act (“NAIC Model”). Consistent with the NAIC Model, Arkansas’ Medicare Supplement laws, rules and regulations policies **do not** apply to policies offered to employer groups. Therefore, the Medicare Supplement law in Arkansas, as in most states, exempts employer groups from the Med Supp regulatory scheme.

As an alternative to offering a “true” Med Supp plan for employer groups, we recently discussed with regulators in a number of states, including Arkansas, the possibility of offering a fully-insured employer group health plan for retirees enrolled in Medicare with benefits that exactly mirror the standard Medigap plan designs A, B, C, F, high deductible F, K and L (“Group “Medigap” Type product”). We want to file this Group “Medigap” Type product in all 50 states and the United States territories of Puerto Rico, Guam and the U.S. Virgin Islands. We hope to offer this product with a January 1, 2010 effective in all States and United States territories.

Benefit Mandates Should Not Apply

We have confirmed with several states that Aetna will be permitted to offer this Group “Medigap” Type retiree product in their states. (Florida did not incorporate the NAIC model exemption for employer groups, so in Florida, we will have to offer a “true” group Medigap product.)

We have also reached out to several states to confirm that state benefit mandates would not apply to this Group “Medigap” Type product. Given that the product’s benefits will exactly mirror the standard Medigap plan designs and will provide a limited-type of

coverage that “fills the gaps” in Medicare (just like “true” Medigap), we believe that state benefit mandates should not apply.

Aetna currently offers traditional retiree plans with comprehensive benefits that coordinate with Medicare. There is no question that state mandates should apply to these types of comprehensive plans. However, the Medigap plan designs that will form the basis of our new retiree plans provide limited benefits that are generally defined with reference to what Medicare doesn't cover. For example, Medigap plans do not provide a comprehensive benefit for physician services. Rather, depending on the particular plan design, the Medigap plans cover all or a portion of the Part B coinsurance or co-payment, and in some cases, the Part B deductible and/or Part B excess charges. They are not comprehensive benefit plans to which mandated benefit laws were intended to apply.

The standard Medigap plan designs are well understood and accepted. We are concerned that adding state-specific mandates to this product would only serve to unnecessarily complicate the product design, potentially create consumer confusion and create inconsistency in plan design for employers offering this product in multiple states. Thus far, the states of Alabama, Alaska, Connecticut, Iowa, Louisiana, Missouri, New Hampshire, New Jersey, New York, Ohio, Oregon, South Carolina, South Dakota, Virginia, Wyoming and West Virginia and the U.S Virgin Islands agreed with our analysis and confirmed that state benefit mandates would not apply to our Group “Medigap” Type product. Like Arkansas, these states are rigorous in their protection of consumers and we believe they would not provide such guidance if they were not completely persuaded that such an approach was in the best interests of Medicare-eligible retirees residing in their states.

Conclusion

For all of the reasons noted above, we believe that exempting this product from benefit mandates would further the interests of Medicare-eligible retirees residing in the State of Arkansas by offering them another clear and affordable health care option.

We appreciate the opportunity to provide the Department with further information in support of this filing. Should the Department have any questions or concerns regarding this letter, Aetna looks forward to the opportunity to answer those questions and to discuss those concerns with the Department.

The material within brackets is intended to be variable, and may be subject to omission, inclusion or change according to the needs of a particular policyholder. Upon issuance of these documents, the placement of textual material may vary to avoid gaps that would otherwise be created by the deletion of bracketed material. Coverage, sections and/or provisions may appear in sequence other than that shown. Connective words and phrases, which serve the grammatical purpose of meaningful continuity and do not affect the description of the payment of benefits or other terms or conditions of the group policy, may vary as the sense demands. A detailed explanation of variability has been provided with this submission.

These forms were submitted to the State of Connecticut Department of Insurance, Aetna's state of domicile and approved for use outside of Connecticut on February 12, 2009.

We appreciate the opportunity to provide the Department with further information in support of this filing. Should the Department have any questions or concerns regarding this letter, Aetna looks forward to the opportunity to answer those questions and to discuss those concerns with the Department. Please do not hesitate to contact me at the address, e-mail address or telephone number noted above.

Sincerely,

Doreen M. Gatley

Product & Regulatory Approvals Department
/Enclosures