



ASSURANT
Health

501 West Michigan
P.O. Box 3050
Milwaukee, WI 53201-3050
T 800.800.1212

October 8, 2010

www.assurant.com

James Mayhew
Health and Human Services
Office of Consumer Information and Insurance
Office of Oversight
Room 737-F-04
200 Independence Ave. SW
Washington D.C. 20201

Re: Waiver Application of Time Insurance Company and John Alden Life Insurance Company's
RightStart and SaveRight Products

Dear Mr. Mayhew,

RightStart and SaveRight plans are limited major medical plans. They are designed for healthy people entering the health insurance market. In order to keep premium rates manageable for these insureds, the plans contain annual limitations on outpatient services, prescriptions and have an annual dollar limitation. We seek a waiver of the application of the imposition of the restricted annual limits portion of PPACA. The request is set forth below:

RightStart/SaveRight

1. Benefits include those under most individual major medical plans. All plans contain a (b)(4) calendar year maximum on prescription drugs. The plan combinations which include the annual dollar maximums are:
 - (b)(4) outpatient maximum/ (b)(4) annual maximum
 - (b)(4) outpatient maximum (b)(4) annual maximum
 - (b)(4) outpatient maximum (b)(4) annual maximum
 - (b)(4) outpatient maximum (b)(4) annual maximum
 - (b)(4) outpatient maximum/no annual maximum
 - (b)(4) outpatient maximum/no annual maximum
2. There are currently 4,700 plans with effective dates after 3/23/2010, whose next plan year begins 1/1/2011. We stopped selling these plans on August 28, 2010.
3. The annual limits we seek to maintain are listed above in Number 1. The premium rates for this form are based on many factors including age, gender, family composition, state, area, prior coverage, smoking status, period of coverage, and benefit plan design. The possible plan designs vary by deductible, coinsurance, copay, outpatient maximum, annual maximum, PPO network, and various optional riders. Because there are so many possible combinations, it is impractical to list them all. See the table below for some

Assurant Health markets products underwritten by Time Insurance Company, Union Security Insurance Company and John Alden Life Insurance Company.

examples of annual premium rates. These rates were all calculated for a standard single policyholder with prior coverage in Milwaukee, sin, selecting a (b)(4) deductible RightStart PPO plan with (b)(4) coinsurance up to (b)(4) a outpatient maximum; and (b)(4) annual maximum using Trilogy Health Network.

Gender	
(b)(4)	
(b)(4)	
(b)(4)	

4. Compliance with the removal of the annual maximums would result in a significant increase in premiums paid by our insureds. The increase in premium necessary to account for removal of the annual maximums range from (b)(4) to (b)(4) depending on the coverage options. The average increase will be (b)(4)
5. Attestation of Chief Executive Officer is attached.

We respectfully request that a waiver be granted as set forth above. Please contact me if you have questions or require additional information. Thank you for your consideration.

Sincerely,

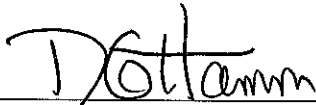


Julia M. Hix
Vice President, Regulatory Compliance
Assurant Health Compliance Officer
julie.hix@assurant.com
(T) (414) 299-7830
(F) (414) 299-6168
Julia M. Hix

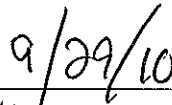
Attestation

Pursuant to the September 5, 2010 Insurance Standards Bulletin Series – Information, OCIIIO Sub-Regulatory Guidance (OCHIIO 2010 – 1): Process for Obtaining waivers of the Annual Limits Requirements of PHS Act Section 2711, I hereby attest to the best of my knowledge and belief, as follows:

1. RightStart and SaveRight plans were in force prior to September 23, 2010.
2. Application of the restricted annual limits to such plans would result in a significant increase in premiums paid by those covered by such plans.



Donald Hamm, Chief Executive Officer
Assurant Health, products underwritten by
Time Insurance Company and John Alden Life
Insurance Company



Date

From: Andrews, Jane (HHS/OCIIO)
Sent: Wednesday, October 27, 2010 10:51 AM
To: Gary, Lapreea (HHS/OCIIO)
Subject: FW:

Importance: High

Follow Up Flag: Follow up
Flag Status: Red

Attachments: 9.29.2010 Waiver Application - Time Insurance Company and John Alden Life Insurance Company.pdf; 10.8.2010 Waiver Application - RightStart and SaveRight.pdf

Let me know if you see these in the Assurant file, or if they are in separate files. Not sure what happened with them. Please reply back to me and Alex. Tnx.

Jane W. Andrews
OCIIO
7501 Wisconsin Ave
Bethesda, MD 20814
301-492-4122 (desk)
202-536-6779 (Blackberry)

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Botwinick, Alexandra (HHS/OCIIO)
Sent: Wednesday, October 27, 2010 10:09 AM
To: Andrews, Jane (HHS/OCIIO)
Subject: FW:
Importance: High

Jane,

We approved plans: Access A, B, C, and KeyMed...I don't think we have RightStart and SaveRight on file. Ms. Blake said she has been communicating with you. Please read the below e-mail and come let me know your thoughts when you get a chance. Thanks!

Alexandra Botwinick

Office of Oversight
HHS/OCIIO
(301) 492-4177
alexandra.botwinick@hhs.gov

From: Alicia.Blake@Assurant.com [mailto:Alicia.Blake@Assurant.com]
Sent: Wednesday, October 27, 2010 9:14 AM
To: Botwinick, Alexandra (HHS/OCIIO)
Cc: OCIIO Oversight
Subject: Re:

ASSUR 10-8:000004

Ms. Botwinick,

I received the approval letter for the Waiver of the Annual Limits Requirements you sent yesterday afternoon.

We submitted separate applications for different products. One application was submitted September 29th and additional information, as requested, was submitted to Jane Andrews on October 21st. The second application was submitted October 8th. Copies of both initial applications are attached below for your reference. Can you please indicate which application was approved?

Thank you,

Alicia Blake

Senior Contract Compliance Analyst
Assurant Health
Legal Department
p: 414.299.8713
f: 414.299.6168

From: "Botwinick, Alexandra (HHS/OCIIO)" <Alexandra.Botwinick@hhs.gov>
To: "alicia.blake@assurant.com" <alicia.blake@assurant.com>
Date: 10/26/2010 02:06 PM
Subject:

Ms. Blake,

Thank you for submitting an application for a Waiver of the Annual Limits Requirements of the PHS Act Section for Assurant Health. HHS has reviewed your application and made its determination. Please see the attached letter.

Please confirm receipt of this letter by replying to this e-mail address with a copy to OCIIOoversight@hhs.gov.

Please let me know if I can be of further assistance.

Sincerely,

Alexandra Botwinick

Office of Oversight
HHS/OCIIO

alexandra.botwinick@hhs.gov

ASSUR 10-8:000005

[attachment "Updated Jan 1 Approval Letter .pdf" deleted by Alicia Blake/HEALTH/ASSURANT/US]

This e-mail message and all attachments transmitted with it may contain legally privileged and/or confidential information intended solely for the use of the addressee(s). If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, forwarding or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete this message and all copies and backups thereof. Thank you.

ASSUR 10-8:000006