

May 27, 2014

Roger A. Sevigny, Commissioner
New Hampshire Insurance Department
21 South Fruit Street, Suite 14
Concord, NH 03301

Dear Commissioner Sevigny,

Re: **Request for Public Comment on SHOP Employee Choice for New Hampshire in 2015**

I write in response to your request for public comment on the Employee Choice function on the SHOP Marketplace in 2015, and I thank you for the opportunity to offer the perspective of Northeast Delta Dental. I understand that CMS has not yet indicated whether the Employee Choice function will be available in time for the 2015 Open Enrollment period, and that each state has the option of delaying that function's effective date until the 2016 Open Enrollment period. As a carrier offering products on the New Hampshire Marketplaces, Northeast Delta Dental prefers a 2016 effective date for Employee Choice on the New Hampshire SHOP Marketplace for the reasons given below.

Northeast Delta Dental is supportive of the Employee Choice option on the SHOP Marketplace. However, as of this date, there is still too much unknown about how that function will operate for stand-alone dental plans. For this reason, we are not able currently to address whether or how Employee Choice would create adverse selection on the New Hampshire SHOP Marketplace in the dental market. Relatedly, even if all the necessary operational information were to be made available today, there would be insufficient time for our information technology systems to be adapted, tested, and ready for this additional function for the 2015 Open Enrollment period. The testing period is already very tight for the SHOP functions that will roll out in this inaugural year of the SHOP Marketplace.

The possibility of Employee Choice becoming effective mid-2015 presents added complexity. The first year of the SHOP Marketplace already faces challenges due to its newness; changing employee's options mid-year could also put employers in the position of having to explain to its employees why some of them have more 2015 plan options than those who enrolled earlier.

For these reasons, we prefer the Department delay the implementation of the Employee Choice function until the 2016 Open Enrollment period. Thank you for your consideration.

Sincerely,



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