



**The State of New Hampshire
Insurance Department**

21 South Fruit Street, Suite 14
Concord, NH 03301

**Roger A. Sevigny
Commissioner**

**Alexander K. Feldvebel
Deputy Commissioner**

June 24, 2016

Hello Carriers/TPAs,

This is to inform you that the New Hampshire Insurance Department will continue to take no action to enforce the data submission requirements under RSA 420-G:11 to the NHCHIS for submissions due prior to October 1, 2016. This will provide approximately 90 days from the June 10, 2016 effective date of SB 431, a bill that clarifies data submission requirements to the Insurance Department by insurers in light of the U.S. Supreme Court's *Gobeille v. Liberty Mutual* decision. Submissions that would normally be due in June, July, and August will not be considered past due until October 1, 2016. Carriers that chose to not submit data until September must submit all outstanding data including March, April, May, June, July and August data by October 1. It is our belief that by October the adoption of rules under RSA 541-A as required in SB 431 will be complete, and implementation of the new requirements under the bill can begin.

This notice of non-enforcement does not apply to data files and submissions that were due prior to March 1, 2016. Any outstanding files that were rejected or contain errors need to be resubmitted in the proper format so that all files can be accepted with no failures.

If applicable, separate New Hampshire Health Protection Premium Assistance Program (PAP) data must continue to be submitted as described under your memorandum with DHHS. Also, it is recommended that carriers/TPAs that process no data affected by the Supreme Court decision continue to submit data on the normal schedule.

The New Hampshire Insurance Department and the NHCHIS team are available to answer any questions. Please send any technical questions you may have to nhchissupport@milliman.com. Thank you in advance for your cooperation!

A handwritten signature in black ink, appearing to read "Maureen Mustard".

Maureen Mustard
Director of Healthcare Analytics
New Hampshire Insurance Department