



October 14, 2016

Commissioner Roger A. Seigny  
Department of Insurance  
21 South Fruit Street, Suite 14  
Concord, NH 03301

Re: Draft Network Adequacy Rules

Dear Commissioner Seigny,

The New Hampshire Breast Cancer Coalition (NHBCC) is a grassroots non-profit organization with a mission to advocate for and provide assistance to New Hampshire residents with breast cancer.

Unanimously, NHBCC Board members agreed the proposed administrative rules (Ins 2701) are inadequate with respect to including basic minimum standards of pathology services for patients. We respectfully request that you address this issue in the rules to ensure pathologists and their services are sufficiently described, to guarantee appropriate access to health care for insured individuals. The proposed rules are vague, as they do not state how in-network status for pathology services fits into state requirements for health insurance plans. Without amending the rules, it is obvious the issue will be left open for broad interpretation by health carriers and will most likely have a negative impact on the insured requiring pathology services.

We are aware the New Hampshire Medical Society, the College of America Pathologists and the New Hampshire Prostate Cancer Coalition have also expressed their concerns relative to the omission of pathology services. Based on their broad collective expertise in the fields of medicine and insurance, we urge you to reconsider this significant issue.

Sincerely,

A handwritten signature in cursive script that reads "Nancy A. Ryan".

Nancy Ryan, President  
New Hampshire Breast Cancer Coalition