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July 28, 2010

Mr. Richard Popper
Deputy Director
Office of Consumer Information and Insurance Oversight
U.S. Department of Health & Human Services
Attn: Ms. Laura Dash
200 Independence Avenue, S.W.
Washington, D.C. 20201

Re: Implementation Plan for Federal Pre-Existing Condition Insurance Plan ("PCIP") in Arkansas

Dear Mr. Popper:

This correspondence and the attachments included herein serve as the Arkansas Comprehensive Health Insurance Pool's ("CHIP's") project implementation plan ("Implementation Plan") as referenced in Section A.7 of the Solicitation for State Proposals to Operate Qualified High Risk Pools and Section B.3.1 of the Contract to Operate a Qualified High Risk Pool.

For your reference, each item requested to be addressed in the Implementation Plan is reproduced below and is followed by the corresponding response. Where a response is complemented by information contained in an attachment, a reference thereto is made.

ITEM 1: Please identify the specific date(s) on which CHIP, as the Contractor, will announce the availability of the Pre-Existing Condition Insurance Plan ("PCIP") to the public.

RESPONSE: Below is a summary of the actions CHIP has already taken and will continue to take in order to announce the availability of the PCIP to the Arkansas public.

- In late June and early July, CHIP and the Arkansas Insurance Department ("AID") provided information for an article published prominently on July 2, 2010 in the Arkansas Democrat Gazette, the newspaper with the widest general circulation in Arkansas.
- On July 20, 2010, the AID Commissioner, Jay Bradford, issued a press release announcing the start-up of the PCIP in Arkansas (*See Exhibit # 1 for a copy of the Press Release*);

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- On July 22 and July 23, 2010, Mike Castleberry, Secretary and Treasurer of CHIP, conducted on-air interviews with local news channels in Pulaski County, Arkansas concerning the start-up and availability of PCIP; these newscasts are broadcast widely throughout the state.
- On July 29 and/or July 30, 2010, Blue Advantage Administrators (“Blue Advantage”) will:
 - Mail informational flyers to all independent agents in Arkansas, using its agent database (*See Exhibit # 2 for a draft copy of Agent Flyers*); and
 - Provide similar flyers to the Department of Workforce Services (handles unemployment matters in the state of Arkansas), the AID and potentially the Arkansas Department of Health and Department of Human Services.
- On August 1, 2010, and likely two (2) more times over the course of the year, a paid advertisement will be placed in the Sunday edition of the Arkansas Democrat Gazette discussing the start-up and availability of PCIP (*See Exhibit # 3 for a draft copy of the Advertisement*);
- Public Service Announcements will be sent to other major state newspapers and weekly newspapers and CHIP believes this will generate additional exposure and media attention, given that PCIP is of significant public interest;
- During September 2010, CHIP’s administrative service contractor, Blue Advantage, will include information concerning the PCIP in its quarterly newsletter to its network providers and pharmacies in the state; and
- Throughout 2010, Blue Advantage marketing personnel will regularly contact local news stations in regard to appearances (by either CHIP Board Members or AID personnel) on morning and noon shows, in an attempt to provide additional free exposure.

ITEM 2: Please identify the specific date on which CHIP will begin accepting plan enrollments (*i.e.*, applications) for the PCIP.

RESPONSE: CHIP will begin accepting applications beginning on August 1, 2010.

ITEM 3: Please identify the specific date on which CHIP will begin to cover claims submitted by or on behalf of PCIP enrollees.

RESPONSE: CHIP will begin to cover claims submitted by or on behalf of PCIP enrollees beginning September 1, 2010.

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Also enclosed for your files as Exhibits 4 and 5 are copies of the final Application and Outline of Coverage for the PCIP in Arkansas, which were approved by the AID as of today's date. The premium rates included as part of CHIP's contract with HHS also were approved by AID today.

CHIP will continue to work with the Office of Consumer Information and Insurance Oversight to achieve their mutual goal of ensuring that Arkansas consumers receive accurate and timely information concerning the implementation of PCIP in Arkansas.

Thank you in advance for your time and consideration in this matter. Please do not hesitate to contact us should you have any questions or comments.

Respectfully,

MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.

By 
Charles B. Cliett, Jr.

CBC
Enclosures