

**STATE OF NEW HAMPSHIRE**  
Inter-Department Communication

**DATE:** June 7, 2022

**FROM:** Michael A. Morrell  
Acting Administrative Rules Director

**AT (OFFICE):** Legislative Services

**SUBJECT:** Final Proposal 2022-18 Department of Insurance Long-Term Care Insurance Rules

**To:** File

Attached are Christina Muñiz's comments on Final Proposal 2022-18 from the Department of Insurance (Department) regarding the adoption, readoption, and readoption with amendment of Ins 3601 on long-term care insurance rules.

There a substantive comment is on page 44. In addition, there is a note to JLCAR on page 1. The substantive comment relates to a section of the rule which appears to allow the rule to supersede state statutes which could be beyond the authority of the agency.

The note to JLCAR simply explains that this rule is based on the National Association of Insurance Commissioners model rule. It does not need to comply with certain formatting requirements of the *Rulemaking Manual*, and that is why there are minimal comments and the rule does not look like other NH rules.