



April 6, 2017

Angela Nelson
Director of Market Regulation and Chief Industry Liaison
Missouri Department of Insurance, Financial Institutions and
Professional Registration
301 West High St., Room 530
P.O. Box 690
Jefferson City, MO 65102

Re: Expedited Request for No-Action Letter

Dear Ms. Nelson:

Blue Cross and Blue Shield of Kansas City (“BCBSKC”), a health services corporation under Chapter 354 of the Missouri Revised Statutes, submits this expedited request for a “no-action letter” pursuant to RSMo. Section 374.018. Specifically, BCBSKC requests that the Department issue a no-action letter stating that BCBSKC may discontinue offering or renewing individual health insurance coverage in 2018 that does not constitute either grandfathered and/or grandmothers coverage, but avoid being deemed to have exited the individual market under RSMo. Section 376.454.4(1). Accordingly, BCBSKC would not be (i) required to provide 180-days’ advance notice of such discontinuance or (ii) prohibited from issuing new policies in the individual market for a period of five years.

BCBSKC is currently evaluating various options for providing coverage in the individual market in 2018. One of these options includes renewing only its grandfathered and/or grandmothers policies. Thus, under this option, BCBSKC would not offer or renew any other individual policies. BCBSKC is requesting that the Department not deem this potential course of action to be a market exit, thereby allowing BCBSKC to issue new policies in the individual market as early as 2019.

Please feel free to contact me by telephone at (816) 395-2801 or email at Coni.Fries@BlueKC.com with any questions.

Very truly yours,

/s/ Coni Fries

Coni Fries
Vice President of Government Relations

