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BEFORE THE NEW MEXICO
OFFICE OF SUPERINTENDENT OF INSURANCE

IN THE MATTER OF REPEALING AND
REPLACING RULES CODIFIED AT
13.19.4 NMAC MULTIPLE EMPLOYER
WELFARE ARRANGEMENTS,

Docket No.
2022-0065

VIDEOCONFERENCE HEARING
DATE: Thursday, October 6, 2022
TIME: 9:01 a.m.
BEFORE: Hearing Officer Anastasia Stevens
LOCATION: Remote Proceeding
Santa Fe, NM 87501
REPORTED BY: Brett Torrence, Notary Public
JOB NO.: 5412591

A P P E A R A N C E S

ALSO PRESENT:

Freya Joshi, Law Clerk, Office of Superintendent
of Insurance (by videoconference)

Cassandra Brulotte, Counsel of Record, Office of
Superintendent of Insurance (by videoconference)

Michael Kreiter, Senior Director of State
Government Affairs, National Association of
Professional Employer Organizations (by
videoconference)

Daniel Harris, Senior Director and Regulatory
Affairs Counsel, TriNet (by videoconference)

Elna Basham, Corporate Counsel, Paychex (by
videoconference)

Tricia Russo, Director of Government Affairs,
Justworks (by videoconference)

Melissa Kelly, ADP TotalSource (by
videoconference)

Patty Padon, CEO, Independent Insurance Agents of
New Mexico (by videoconference)

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E X H I B I T S

NO.	DESCRIPTION	ID/EVD
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P R O C E E D I N G S

THE REPORTER: We are now on the record
at 9:01 a.m.

THE HEARING OFFICER: This is Office of
the Superintendent, docket number 2022-0065, In the
Matter of Repealing and Replacing Rules Codified at
13.9.4 [sic] NMAC Multiple Employer Welfare
Arrangements.

Good morning. I'm Anastasia Stevens.
I'm a contract attorney for the Office of
Superintendent of Insurance and I've been appointed as
a replacement hearing examiner in this matter. I have
a lot of regulatory experience and have done hearings
for the Superintendent of Insurance before.

Because we're conducting this hearing
by video conference primarily, and possibly by
telephone if anybody chooses that route -- as of now,
they haven't -- I'll ask you all to mute your
microphones and -- or -- until called upon. This
is -- and not talk over one another, which I'm
probably going to be the worst offender on, but we
need to help the court reporter, Mr. Brett Torrence,
to get a good clean record in this case.

I'll be presiding over this hearing and
the transcripts will be filed in the docket following

1 the hearing. The caption in this case is In the
2 Matter of Repealing and Replacing Rules Codified at
3 13.9.4 [sic] Multiple Employer Welfare Arrangements.
4 In addition to the general rulemaking authority found
5 in the New Mexico insurance code, statutory authority
6 for promulgation of these proposed rules is found in a
7 number of sections in the insurance code that are
8 listed in section 13.19.4.3 as a proposed rule as
9 issued by the Superintendent of Insurance on August
10 23, 2022.

11 I'm -- this is a long list of
12 authorities. I'm not going to read them into the
13 record unless anybody asks me to.

14 The notice of proposed rulemaking was
15 published as required by law in the New Mexico
16 Register on August 23, 2022, and in the Albuquerque
17 Journal also on August 23, 2022, and was distributed
18 via the OSI's newsletter to a list of potentially
19 interested parties. The notice of proposed rulemaking
20 and the full text of the proposals are available
21 through a link on the OSI website.

22 The notice of proposed rulemaking and
23 the proposed rules also have been -- are available
24 from the onward classroom, the New Mexico Office of
25 Superintendent of Insurance.

1 In addition to scheduling this public
2 comment hearing, the original notice of proposed
3 rulemaking provided interested parties and members of
4 the public with the opportunity to submit written
5 comments. Because of issues with the posting on the
6 New Mexico Sunshine Portal that subsequently have been
7 resolved, a supplemental notice of proposed rulemaking
8 was issued on September 20, 2022.

9 Pursuant to that supplemental notice,
10 the deadlines for written comments have been extended.
11 Initial written comments are now due no later than 4
12 p.m. on Wednesday, October 12, 2022. After oral
13 comments are taken today at this hearing, written
14 responses to any of the written comments or oral
15 comments may be filed in this docket no later than 4
16 p.m. on Monday, October 24, 2022.

17 Only -- to my knowledge, only one set
18 of comments has been filed so far, so we're looking
19 forward to getting them from this big crowd here. So
20 pursuant to the notice of proposed rulemaking, any
21 oral comments from today's hearing and all the written
22 comments will be considered by the superintendent.

23 So far -- so that the superintendent
24 does not initiate, commit or consider communication
25 directly or indirectly with a party or party's

1 representative outside the presence of other parties
2 regarding this matter until the record has been
3 closed, superintendent will close the record in this
4 matter on the earlier of 30 days following this public
5 hearing or the date final order is issued in this
6 case. Once the record is closed, no further oral or
7 written communications concerning this rulemaking will
8 be entertained or considered by the superintendent.

9 Pursuant to the notice of proposed
10 rulemaking, all public comments will be accepted at
11 this hearing. This is the one opportunity to have
12 on-the-record public comments and oral comments and it
13 looks like many of you are here to do that.

14 I'm surprised and pleased. We are
15 continuing to practice social distancing as a result
16 of COVID-19, which is why this hearing is being held
17 via video conference and telephone. Please bear with
18 me because I've been involved in a lot of hearings as
19 an attorney via Zoom, but this is the first one I'm
20 actually hosting and I am counting on Freya Joshi at
21 the OSI to keep me in line and keep us online. And
22 please let me know if you think I'm speaking too
23 quickly or otherwise do something wrong.

24 If you intend -- now, there are a lot
25 of people here. Not sure that all of you intend to

1 provide oral comments today. So if you do, please
2 type your name in the chat function on your screen
3 directed to everyone.

4 We'll take a second -- given how many
5 people are here, we'll take a second or two to do that
6 in order for me to determine whether we'll need to put
7 certain time limits on participants because I
8 just -- we're at the level here where we have quite a
9 few people. Ordinarily, I wouldn't necessarily
10 be -- necessary to do that, but I think given the
11 crowd here, it would be a good idea.

12 And when I call upon you for your -- by
13 name for your comment please speak clearly, probably
14 more slowly than I am speaking right now, so that
15 everybody can hear you. State your name, your address
16 and the organization, if any, that you represent and
17 spell your name, please, also for the court reporter.
18 If you're representing an entity with an acronym,
19 please clearly state the full name of the entity as
20 well as the acronym and that'll help us make a
21 complete record.

22 And if we can take a brief pause here
23 and ask those of you who wish to speak to put your
24 names in the chat box. I, right now, have -- one,
25 two, three, four, five, six -- seven people. So with

1 that, I think that it's not necessary to ask anybody
2 to specifically stop at five minutes or ten minutes or
3 something, but I anticipate that each of you will
4 use -- will be responsible and not take too much of
5 everybody's time.

6 Finally, I'd like to urge you to
7 remember that you have the opportunity to file written
8 comments and indeed, in this exceptional circumstance,
9 to have a good bit of time to think about your initial
10 comments as well as your response comments and please
11 send them our way on by -- on or before the 12th.

12 I will ask you again at the end, but
13 another thing that would be very helpful to me as the
14 hearing examiner and to the Office of the
15 Superintendent of Insurance is to provide redlined
16 copies or proposed language on your changes and make
17 comments about big and small, punctuation, worrying.
18 All this will matter -- it may not seem like the most
19 important thing today to you because we've got big
20 concepts to address, but at the end of the day when
21 there's a filed rule, we want it to not have
22 unnecessary ambiguities. So I appreciate that.

23 And with that, we're going to take
24 comments in the order of those who were foolish enough
25 to sign up first, and the first person I have here is

1 Cass Brulotte of the Office of Superintendent of
2 Insurance. So I'm going to ask everybody to
3 be -- except Cassandra to be muted. I will even mute
4 myself. I hope that -- Mr. Torrence, you're not
5 getting any background noise; are you? At this point
6 or -- I'm hearing a slight buzz.

7 THE REPORTER: I'm not hearing
8 anything, but so far, I've been able to hear you
9 clearly. So I'll let you know if there's a problem on
10 my end.

11 THE HEARING OFFICER: Okay. With that,
12 let's move on to the taking of public comment and
13 Ms. Cassandra Brulotte, which I'm probably pronouncing
14 incorrectly, so --

15 MS. BRULOTTE: Actually -- thank you,
16 Madam Hearing Officer. You are pronouncing it
17 correctly. That might be a first. My name is Cass
18 Brulotte. That's B as in boy, R-U-L-O-T-T-E. I am
19 the counsel of record on this matter for the Office of
20 Superintendent of Insurance.

21 I just wanted to use this opportunity
22 to briefly thank everyone who had worked with us
23 during the informal rulemaking process where we
24 circulated drafts of the proposed regulation and were
25 able to get some really good feedback from some of the

1 individuals I do see here today. We really valued
2 that insight and it was able to get us to a closer
3 place of collaboration and I look forward to
4 continuing to work together as we move forward in the
5 formal process, much as we did in the informal
6 process.

7 The reason we are here to repeal and
8 replace the MEWA rule is twofold. The first is that
9 the Department of Labor updated the MEWA guidance in
10 April specifically addressing times in which PEOs,
11 Professional Employer Organizations, constitute MEWAs
12 and so we needed to bring our regulation up to snuff
13 to match the federal guidance.

14 And similarly, we made the decision
15 that we need to prohibit the operation of self-insured
16 MEWAs in this state and so we removed all references
17 in the regulation, or at least I hope I did, that were
18 addressing self-insured MEWAs, so that now going
19 forward, the plan is that all MEWAs would need to be
20 purchasing fully insured products from our licensed
21 health insurance carriers that are authorized to
22 operate in this state. Thank you.

23 THE HEARING OFFICER: Thank you,
24 Ms. Brulotte. Our next speaker is Michael Kreiter.
25 Did I get that one right?

1 MR. KREITER: You did. You're two for
2 two today. You're doing great, Madam Hearing Officer,
3 and thank you very much.

4 THE HEARING OFFICER: Thank you.

5 MR. KREITER: May I proceed? Thank you
6 so much. So my name is Michael Kreiter. I represent
7 the National Association of Professional Employer
8 Organizations, otherwise known as NAPEO. We're the
9 national trade association that represents the PEO
10 industry and I'm here to offer some comments in
11 support of our forthcoming comment letter on October
12 12th.

13 We understand from conversations that
14 we've had with OSI staff that OSI doesn't intend for
15 its regulation of PEO-sponsored plans to disrupt the
16 PEO's ability to continue to offer fully insured large
17 group plan coverage and that OSI believes this rule,
18 as currently drafted, would allow for the continued
19 offering of such plans.

20 While we certainly share and appreciate
21 that objective, we believe there needs to be some
22 additional amendments to eliminate any potential
23 ambiguity. Our written comments will promote that
24 goal, ensuring the New -- that New Mexicans can
25 continue to have access to large group fully insured

1 PEO-sponsored health coverage.

2 And, Madam Hearing Officer, just for
3 your edification, I wanted to give a little history of
4 kind of PEOs and it will be brief. I won't take up 10
5 or 15 minutes, just a couple. But by way of
6 background, PEOs provide comprehensive HR solutions to
7 small- and mid-sized businesses that allow our clients
8 to focus on their -- what they do best, their core
9 competencies, and so they can maintain and grow their
10 business.

11 We offer -- PEOs offer a suite of
12 services, including the administration of benefits,
13 workers' compensation, preparation of payroll,
14 remittance of employment taxes, assistance with other
15 federal and state compliance and because of these
16 services, those businesses that use a PEO, they tend
17 to grow faster, they have lower employee turnover and
18 are also less likely to go out of business.

19 So in New Mexico, there are thousands
20 of employees who enjoy the benefits of being in a PEO
21 relationship. There are more than 100 PEOs currently
22 registered with the states according to the New Mexico
23 Regulation and Licensing Department. That's the
24 regulating body for employee leasing contractors,
25 which are otherwise known as PEOs.

1 Do PEOs assume substantial employer
2 responsibilities. We're the W-2 employer of the
3 clients' covered employees and because of this, the
4 health insurance carriers have issued large group
5 policies to the PEOs as the insured and plan sponsors
6 and that allows these services to be offered to the
7 covered employees of the PEOs clients.

8 In the vast majority of states where
9 PEOs are regulated, PEO-sponsored, fully-insured plans
10 are treated as single employer large group plans and
11 as a result, those insurance policies through which
12 the PEO-sponsored health benefits are provided would
13 continue to be fully regulated by the OSI, like any
14 other insured arrangement, purchased by an employer,
15 for the benefits of its employees.

16 This model, PEO model, is not a new
17 concept. We've been operating for decades in New
18 Mexico, both pre and post ACA, with no negative
19 implications on the New Mexico's health insurance
20 markets.

21 I also want to make it clear that PEOs
22 don't sell health insurance to their clients nor to
23 its covered employees. PEOs, like other large
24 employers, sponsor a health plan for the benefit of
25 our worksite employees and we only offer those -- that

1 participation in the health plan to those covered
2 employees who are subject to the agreement. Again, we
3 do this in our capacity as an employer responsible for
4 providing that benefit under such agreement.

5 And I'll just close by letting you know
6 that there are over 40 states that have an active PEO
7 registration or licensing statutes that define PEOs,
8 define their employer responsibilities, and as stated
9 earlier, a vast majority of those states specifically
10 address how PEO -- address PEO-sponsored health plans.
11 And I'll just note that in fact no other state
12 requires a PEO to register as a MEWA and does not also
13 permit them to sponsor a large group plan. We
14 certainly don't want New Mexico to be that outlier.

15 So our written comments and suggested
16 amendments that we plan to send ahead of the October
17 12th deadline will be reflective of this very common
18 practice around the country. We believe it'll be
19 critical to add clarifying language surrounding a
20 PEO's ability to sponsor large group coverage, as we
21 always have, so as to avoid any disruption in our
22 covered employees' health coverage. And I will stop
23 there and I'm happy to take any questions at the
24 appropriate time. Thank you again.

25 THE HEARING OFFICER: Thank you,

1 Mr. Kreiter. Our next speaker is Daniel Harris. Mr.
2 Harris?

3 MR. HARRIS: Good morning,
4 Superintendent Toal and Madam Hearing Officer. My
5 name is Daniel Harris and I represent TriNet, a
6 Professional Employer Organization, also known as a
7 PEO. I thank you for the opportunity to offer verbal
8 comments on the proposed rule.

9 By way of very brief background, TriNet
10 provides comprehensive payroll, benefits and human
11 resources solutions to over 18,000 small- and
12 medium-sized businesses throughout the United States,
13 including of course New Mexico. Most of TriNet's PEO
14 clients consist of non-profits, startups, financial
15 services, tech companies and even restaurants.

16 By allowing TriNet to manage their HR
17 responsibilities, these small- and medium-sized
18 companies can focus on growing their businesses while
19 containing HR costs, minimizing employee-related
20 risks, reducing the administrative burdens of HR and
21 retaining their employees.

22 TriNet is concerned about the proposed
23 rules' potential to disrupt the robust health benefits
24 that our clients and worksite employees have access to
25 because of their relationship with TriNet and that

1 they have come to rely upon for their families. We
2 would urge OSI to amend the proposed rules, as
3 suggested by NAPEO, so that TriNet and other PEOs can
4 continue to provide benefits to small- and
5 medium-sized clients. I thank you for your time and
6 I'd be happy to take any questions.

7 THE HEARING OFFICER: Thank you,
8 Mr. Harris. I'm hoping everybody's going to give me
9 really robust written comments. Our next speaker is
10 Elina Basham from Paychex. Ms. Basham?

11 MS. BASHAM: Yes. Thank you. Thank
12 you, Superintendent Toal and Madam Hearing Officer,
13 for the opportunity to offer verbal comments on the
14 proposed rule. My name is Elina Basham. I'm
15 corporate counsel for Paychex.

16 Paychex is a leader in human capital
17 management with a more than 50-year operating history.
18 We operate the second largest PEO in the country where
19 we also provide comprehensive HR support to
20 medium- and small-sized businesses and their
21 employees, which results in a safer, more compliant
22 workplace and the availability of better employee
23 benefits.

24 Our PEO health and welfare benefits are
25 fully insured, high quality, ACA compliant and they

1 utilize reputable carriers subject to OSI oversight.
2 Many of our clients cannot offer those on their own.
3 However, we have been and anticipate we will continue
4 to be unable to offer them to worksite employees in
5 New Mexico under OSI's recent guidance and the
6 proposed rule.

7 We support the input NAPEO has given
8 OSI to-date, the testimony it presents today and the
9 comments it plans to file shortly. We urge OSI to
10 follow the example of the vast majority of states that
11 regulate PEOs by welcoming fully insured, large group
12 PEO health plans consistently with the legislators'
13 clear intent in the Employee Leasing Act and with the
14 long-established past practice and not to impose
15 onerous, unnecessary requirements on such plans.

16 If OSI does this, the small businesses
17 of New Mexico and their employees will have access to
18 more high-quality health and welfare benefits. Thank
19 you.

20 THE HEARING OFFICER: Thank you,
21 Ms. Basham. We move on now to Tricia Russo.

22 MS. RUSSO: Good morning.

23 THE HEARING OFFICER: Did I get that
24 one right?

25 MS. RUSSO: Yes, that's an easy one. I

1 like to say Russo is like Smith in Italian. You know,
2 there's a lot of us. Good morning,
3 Superintendent -- I'm sorry? Oh, I think you're on
4 mute, Madam Hearing Officer. I think you're on
5 mute --

6 THE HEARING OFFICER: I'm still on
7 mute. Just thought I'd say the accent on the second
8 syllable, if it's the French version.

9 MS. RUSSO: Oh, yes. No, no, the
10 French version is longer, but anyway, sorry to take up
11 some time.

12 THE HEARING OFFICER: Okay. No, we're
13 fine. Please -- I will mute myself again and we'll
14 move on with your comments --

15 MS. RUSSO: Thank you. Good morning,
16 Superintendent Toal and Madam Hearing Officer, and
17 thank you for the opportunity to speak this morning.
18 I will be brief. My name is Tricia Russo. I am
19 director of government affairs for Justworks.
20 Justworks is a national Professional Employer
21 Organization, or PEO. As a national PEO, we have
22 worksite employees in all 50 states, including over
23 250 worksite employees in New Mexico.

24 Justworks opposes these regulations
25 because if they're adopted as written, they will

1 disrupt our ability to offer fully insured, large
2 group health plan coverage to our hundreds of New
3 Mexico worksite employees who are currently being
4 covered. It is our understanding and our hope that
5 OSI does not intend for this disruption in coverage to
6 happen.

7 As such, we urge you to amend the
8 proposed regulations to either remove PEOs completely
9 or to include the NAPEO suggested amendments so that
10 our worksite employees will not be left without health
11 insurance coverage. Thank you again for your time
12 this morning. We will be submitting more detailed
13 written comments by the 12th and happy to answer any
14 questions.

15 THE HEARING OFFICER: Thank you,
16 Ms. Russo. I should be asking -- I won't be asking
17 any questions -- whether any of -- whether anybody
18 else from the Office of Superintendent of Insurance
19 has questions. Let's move on to Melissa Kelly.
20 Ms. Kelly? You are muted. I -- we're still not
21 hearing you. Do you think you're on?

22 MS. BRULOTTE: Ms. Kelly, this is
23 Ms. Brulotte. It shows on our end that you're not
24 connected to the audio which might be why we cannot
25 hear you.

1 (Discussion held off the record.)

2 MS. KELLY: Are you able to hear me
3 now?

4 THE HEARING OFFICER: We are. So --

5 MS. KELLY: Okay. My sincere apologies
6 for the technical difficulties.

7 THE HEARING OFFICER: No problem. It
8 happens all the time. So if you're ready, we'd be
9 happy to take your comments. Thank you.

10 MS. KELLY: Absolutely. Superintendent
11 Toal, Madam Hearing Officer, thank you for the
12 opportunity to speak today about the proposed
13 rulemaking that would repeal and replace the rules
14 codified at Section 13.9.4 [sic] of the NMAC.

15 My name is Melissa Kelly and I'm here
16 on behalf of ADP TotalSource, which is the country's
17 largest Professional Employer Organization. We
18 partner with small- and mid-sized businesses,
19 providing them with comprehensive human resource
20 services and top of-the-line benefits. In New Mexico,
21 we have over 900 worksite employees and we sponsor
22 fully insured large group plans that meet all ACA and
23 MEC requirements. The predominant carriers we partner
24 with are Aetna and UHC.

25 We are supportive of the revisions to

1 the proposed rule that Mr. Kreiter from the National
2 Association of Professional Employer Organizations
3 referenced. We believe those revisions are critical
4 to avoid disruption of the existing group health
5 coverage our New Mexico worksite employees currently
6 enjoy, and we will be submitting written comments to
7 that effect by the October 12th deadline. Thank you
8 for your time today and your consideration and again,
9 for the technical difficulties.

10 THE HEARING OFFICER: Thank you very
11 much, Ms. Kelly. And now we'll move on to
12 Patty -- Padon or Padon?

13 MS. PADON: Padon.

14 THE HEARING OFFICER: Padon --

15 MS. PADON: Padon. You were almost 100
16 percent. Yes.

17 THE HEARING OFFICER: I'm hedging my
18 bets here. Ms. Padon --

19 MS. PADON: Thank you so much. I
20 appreciate it, Madam Hearing Officer and
21 Superintendent Toal, and I just -- obviously we have
22 great comments from all of the people who do PEOs on a
23 regular basis and I want to say that I've had great
24 conversation with Cass and Julie and the
25 superintendent up to this point and I believe that to

1 a great extent, we are all on the same page.

2 And I understand your major concerns
3 and why this change had to come up with the
4 self-funded MEWAs that are in the state and the
5 problems with that and we totally agree with that and
6 I believe everybody that's on here today agrees with
7 that. And that is the reason that we've asked you to
8 actually remove PEOs from this law -- this rule
9 entirely and just give them their own rule, which
10 makes more sense, but I also understand your needs to
11 incorporate them into this.

12 And so I've talked to Michael about
13 this a lot and we agree that we understand where
14 you're coming from, but what worries us a lot is when
15 you're all gone, which, as we all know, we age out of
16 business and we do get to retire at some point, and
17 the days when the people who wrote this -- Julie,
18 Cass, Mr. Superintendent, when you all are gone and
19 people are trying to do PEO business in the state of
20 New Mexico, they're reading that rule and it's
21 extremely confusing and they feel like they can't do
22 what we've done in taking care of our small employers.

23 So that's why we really -- we would
24 like to see it be a lot more specific, a lot more
25 spelled out as to exactly who is allowed to do what

1 and PEOs are really held separately from this and
2 given their own specific rules.

3 So I hope that makes sense. This state
4 is composed of predominantly small employers and it's
5 very difficult for them to follow all the rules of
6 employee law these days and they change on them
7 constantly and these small employers are just trying
8 to do what they're good at in their businesses and
9 that's why they turn to PEOs to handle all of their
10 difficult rules and laws and everything that goes with
11 it.

12 But also, they want good health
13 insurance and I feel like this law is saying that
14 these guys are guilty of going out and creating plans
15 that harm the employees. And in my experience as a
16 broker, all the years that I sold, that was completely
17 the opposite. We did it so that they could get better
18 benefits than what are typically offered on a very
19 small group plan.

20 So it -- the PEOs help small employers
21 immensely. The plans help them a lot and we don't
22 want to see that go away. We don't want to lose that
23 for our small employers in the state of New Mexico. I
24 think what you -- all these people you've heard from
25 today are on a national basis and they're saying that

1 nationally, we're the only ones that are trying to set
2 these rules on PEOs. And I'm not saying we should
3 follow what everybody else does by any means, but I
4 think we should look at that as to would it harm our
5 small employers or would it -- do we leave it as it
6 is?

7 So I have sent in already written
8 comments and so I will probably be doing just a few
9 more to say some of the things I said here today, but
10 I hope everybody else that's on this call will also
11 send in your comments because I think it's very, very
12 important to spell out exactly where you think they're
13 missing the mark because if you don't do that, the
14 superintendent and Cass and Julie don't know exactly
15 where -- what you're trying to get at.

16 So please, everybody, send your
17 comments in and I thank you, everyone from the OSI,
18 for listening to us and allowing us to be here and
19 give our comments.

20 THE HEARING OFFICER: Thank you,
21 Ms. Padon. I do have a couple of questions for you.
22 First, I don't think that you identified whom you
23 represent.

24 MS. PADON: I'm sorry. I'm the CEO of
25 the Independent Insurance Agents of New Mexico.

1 THE HEARING OFFICER: And you indicated
2 something about preferring a separate rule for PEOs.
3 Are you or is NAPEO going to actually propose a
4 separate rule in the comments?

5 MS. PADON: Well, so we believe -- and
6 this was the first -- in the first hearing or the
7 first comment period, I indicated that PEOs, MEWAs,
8 they're completely different entities. Association
9 health plans, those are all completely different
10 entities. They have different structures.
11 They -- association health plans -- if you're talking
12 about association health plan that joins an
13 association for the simple reason of buying health
14 insurance, okay, that's wrong. That's an association
15 health plan.

16 A MEWA has a -- correct me if I'm
17 wrong, Michael -- has a board of directors, it has an
18 employer, it has officers. A PEO does not. It is not
19 a -- a PEO is not a single employer. They are really
20 completely different entities. It's like trying to
21 make oranges and apples be the same thing.

22 And that was the first thing we
23 proposed was can't we separate these out? Can't we
24 remove the PEOs from this language? And they didn't
25 agree with that. So we said, okay, well, then make

1 sure, in the language of this rule, you spell out
2 exactly what a PEO is versus a MEWA. And -- Michael,
3 go ahead.

4 MR. KREITER: If I may, madam -- if I
5 may.

6 THE HEARING OFFICER: Let me interject
7 one second here.

8 MR. KREITER: Sure.

9 THE HEARING OFFICER: Because I think
10 both of you are able to respond to it. Is
11 that -- again, this is based on what you're
12 proposing -- what you're anticipating proposing. Are
13 you cognizant -- to the mechanics of rulemaking so
14 that the superintendent isn't left hanging with no
15 plan for -- no rule in place for entities? I mean, I
16 guess I'm saying are -- in your comments and in your
17 proposed rules, are you -- will you please address a
18 transitional way of getting to maybe where you would
19 most prefer to be? And then take it away,
20 Mr. Kreiter.

21 MR. KREITER: Yeah. I mean, certainly
22 we're happy to -- we're already deep into drafting our
23 rules and we were really focused on being able to
24 continue to sponsor large group health plans.
25 Certainly as Patty had indicated, in the informal

1 process, we had suggested -- because PEOs are, like I
2 mentioned, regulated under the Regulation and
3 Licensing Department and I wholly agree with Patty's
4 description that it's like comparing apples to oranges
5 to bananas.

6 We suggested perhaps going through the
7 RLD and putting some there -- something in there that
8 would require as the regulating body, PEOs should only
9 sponsor fully insured plans in the state, which again
10 would already -- are already subject to oversight.

11 With respect to the MEWA guidance, the
12 DOL guidance that Cass had mentioned at the beginning,
13 we still disagree with that. I know it's -- parties
14 tend to disagree and that's fine. That's -- that
15 doesn't hold any rule of the federal law. It's
16 just -- it's sub-regulatory guidance. It references a
17 letter from 2006 or '07 that still points to the facts
18 and circumstances of each individual case, which is
19 why we disagree to be outright declared a MEWA or
20 deemed a MEWA in a state.

21 So we were thinking of ways to remove
22 us from this rule. So of course, the other side,
23 which is what we agree with, that Cass and the
24 superintendent want to do is to outright ban
25 self-funded MEWAs. We're fine with that, but so that

1 there wouldn't be a lot of this back and forth and
2 either work on it separately through the OSI requiring
3 fully insured plans that could still be large group,
4 as we always have, or go through RLD or even putting
5 some clarification in the Employee Leasing Act through
6 legislation. We know that would be separate. That
7 would clarify basically what is the common -- the very
8 common practice in all other states.

9 MS. PADON: And just to add, Madam
10 Hearing Officer, yes, we did, in talking to Cass and
11 the superintendent and Julie, we do understand he's
12 trying to accomplish this through a rule versus
13 legislation.

14 And we agree with that and that's why
15 we're saying okay, then we'll go along with this where
16 we keep it all under one rule, but can we have some
17 more definitive language towards PEOs and -- 'cause
18 I'm just afraid that at some point when the people who
19 wrote this aren't here anymore, that clarity goes away
20 unless you've been very specific about what is a PEO
21 and which lines of this rule apply to a PEO and which
22 ones don't and that sort of thing. I hope that makes
23 sense.

24 THE HEARING OFFICER: It does. It
25 sounds like you're suggesting there is a means of

1 getting there with a single rule because my concern is
2 that in -- at least in the short run is that, no,
3 there needs to be a rule that covers everything and
4 we're here for this one rulemaking. We can't
5 just -- by saying the ideal to do something
6 different -- big, gigantic hole, and I think you
7 all -- I'm sure you all agree with that. And now I
8 just -- something to my screen, so I --

9 MS. BRULOTTE: Madam Hearing Officer,
10 if I maybe have a brief response to just a couple of
11 points that Mr. Kreiter and Ms. Padon brought up.

12 THE HEARING OFFICER: Yes. Yes. Could
13 you give me one second here? Somehow I -- my screen
14 went tiny and I can't see anything. I don't know what
15 I did. I think I have two desktops. Well, just go
16 ahead and speak and I'll work on it -- what'd I do?
17 Thank you, Ms. Brulotte.

18 MS. BRULOTTE: Thank you, Madam Hearing
19 Officer. So just to clarify on the issue of the
20 possibility of a rule through the RLD, Mr. Kreiter is
21 correct. That was brought up during our informal
22 process, which I mentioned earlier. Unfortunately,
23 the Regulation and Licensing Department cannot issue a
24 regulation on the subject of insurance. They don't
25 have authority to do so, much like we do not have

1 authority to issue regulations on behalf of the
2 Regulation and Licensing Department.

3 So this issue does have to be regulated
4 under the auspices of the authority of the Office of
5 Superintendent of Insurance, which is why we are
6 issuing this rule and it's just not something that
7 could be addressed by a different agency.

8 We do believe this is the appropriate
9 rule to do this under. I understand that there is
10 some dispute with the federal guidance.
11 Unfortunately, from our perspective, the federal
12 guidance is very clear, and I will file that into the
13 record. So, Madam Hearing Officer, you can see it and
14 make your own determinations as well. But the federal
15 guidance does specify the circumstances under which
16 PEOs are considered MEWAs and we reflected that in our
17 proposed language.

18 And to be clear, nothing in this
19 regulation -- not just our intent, but there's not a
20 sentence or phrase in this regulation that would
21 prevent someone from purchasing a fully insured
22 product from many of the partners we see on the call
23 right now, such as Blue Cross and Presbyterian. In
24 fact, that's the intent of the rule, to ensure that
25 fully insured products are being purchased from our

1 licensed carriers.

2 So I understand the concerns that have
3 been expressed today, but I just want to be very clear
4 that, as Mr. Kreiter and Ms. Padon said, not only is
5 that not our intention, but there is nothing in the
6 regulation that would create any kind of barrier or
7 prohibition from purchasing fully insured healthcare
8 products. It's in fact the opposite. It mandates the
9 purchase of fully insured health care products. Thank
10 you.

11 THE HEARING OFFICER: So, Ms. Brulotte,
12 is it your expectation then that all these parties
13 here and departments are on the same page ultimately?
14 It's just a matter of getting the right language
15 or -- and I don't want you to totally speculate, but
16 I'm sure -- I know that you know a lot more than I do
17 and always will about what's involved over time.

18 MS. BRULOTTE: Well, I know I -- I know
19 we all keep referencing this pre-hearing informal
20 process, but, Madam Hearing Officer, it was really
21 largely productive. Ms. Padon and Mr. Kreiter, as
22 they've stated today, were definitely on board with,
23 for example, our barring of the self-insured MEWAs,
24 which is the largest part of this rule.

25 And really the narrow issue is about

1 how to incorporate that federal guidance in such a way
2 that, from OSI's perspective, ensures that we are in
3 line with the federal guidance, but reassures the PEOs
4 that we are not trying to prevent them from offering
5 health insurance as part of their services, and we're
6 not. That's absolutely not the intention.

7 So I think that -- I can't say we're on
8 the same page. We're obviously not on the same page
9 'cause they're going to have different positions, but
10 I believe the intent that we have, like what OSI is
11 absolutely trying to do, is not something that
12 ultimately the comments that I heard today disagree
13 with. They're just concerned about the language and,
14 as Ms. Padon said, how it would be interpreted in the
15 future when myself and Mr. Toal and Ms. Draper [ph]
16 are not here anymore to bolster our interpretation
17 with the drafting.

18 So we can -- I think we'll be able to
19 get to a -- an amicable place and I really do look
20 forward to seeing the recommended drafted language
21 that they propose and we will of course respond in
22 writing.

23 I will note just since you brought it
24 up, Madam Hearing Officer, you may even receive a
25 motion for extension of time for OSI's responses

1 simply because we have three rules pending right now.
2 All of the responses from OSI are due on the same day,
3 October 24th, which -- and they're all my rules. I
4 don't know that I am --

5 THE HEARING OFFICER: Somebody's going
6 to get an extension motion, so --

7 MS. BRULOTTE: I think you can
8 anticipate you'll get an extension motion from me
9 because I am a great lawyer, but I am not Superwoman.
10 So I don't know that I'd be able to get them all done
11 at the same time. So just to kind of put that out
12 there, I will likely be filing an extension motion to
13 give us a little bit more time and since it sounds
14 like there will be detailed comments, that would give
15 yourself more time to really see what everybody has
16 proposed.

17 THE HEARING OFFICER: Thank you. I
18 appreciate that and since this was really Ms. Padon's
19 floor, is there anything more you have to say before
20 we move on to -- I've lost the list --

21 MS. PADON: No, Madam Superintendent,
22 that was all I had to say and thank you so much for
23 the time and I appreciate you hearing us.

24 THE HEARING OFFICER: Thank you. And
25 now I'm looking back at the chat and I think I've

1 covered everyone who signed up to speak, but I know
2 that there are a lot of other people on the call. So
3 I'll give you one last chance. If anybody would like
4 to say something, please add your name to the chat and
5 you will be recognized. Give you a minute or two.
6 I'm not seeing anybody going to chat. Would somebody
7 like to raise their hand? If they're Zoom challenged
8 as I am, then it's easier to raise your hand than to
9 speak in chat. Again, Freya, do you see any signs of
10 anybody wishing to be recognized?

11 MS. JOSHI: I do not.

12 THE HEARING OFFICER: Okay. So I guess
13 with that, we'll bring this comment hearing to a
14 close. I thank you very much everyone who's spoken.
15 Your comments will be taken into consideration,
16 probably with an extension time it looks like. And we
17 would again very, very much appreciate detailed
18 written comments and it sounds like you -- that you've
19 been coordinating already. Again, appreciate unity
20 and not having numerous versions.

21 And lastly, again, it's the little
22 things as well. As Ms. Padon said, in terms of
23 reading this in the future, it's those little things,
24 commas and things that could turn into legal
25 nightmares down the line. So please, to the extent

1 you can -- you've got extra time now. It's not due
2 this afternoon -- go over the language not just with
3 the big picture, but also with a fine-toothed comb and
4 help us create as good a rule as we possibly can.

5 And with that, I thank you all unless
6 anybody has any questions or procedural questions or
7 anything else to be taken care of right now. So it
8 seems like nobody's speaking. So with that, I very
9 much thank you for your comments. They will
10 be -- they're being recorded by the court reporter and
11 they'll be on the record. Mr. Torrence when is the
12 transcript expected?

13 THE REPORTER: We have a ten-day
14 turnaround -- that's ten business days -- unless you
15 would like it to be expedited.

16 THE HEARING OFFICER: I don't think
17 necessary or expected. Can I ask you, though, for
18 you, because it varies from place to place, is next
19 Monday -- Columbus Day, Indigenous People's Day, is
20 that a holiday since it's a holiday in New Mexico? I
21 don't know whether it's under your contract.

22 THE REPORTER: That I'm not entirely
23 sure. It's kind of a question for our transcription
24 team. So I can get back to you if you'd like
25 specification on that.

1 THE HEARING OFFICER: Okay. Again, is
2 anybody in the -- at the hearing concerned about that
3 possible one-day flux? Speak now or forever hold your
4 peace. Thank you. Thank you all. Thank you,
5 Mr. Torrence, thank you, Ms. Freya Joshi, and thank
6 you all of your participants and we will be working on
7 a rule soon enough. Thank you very much and with
8 that, this hearing is closed. Thank you and have a
9 good morning. Bye-bye.

10 THE REPORTER: Off the record at 9:51
11 a.m.

12 (Whereupon, at 9:51 a.m., the
13 proceeding was concluded.)
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CERTIFICATE OF DEPOSITION OFFICER

I, BRETT TORRENCE, the officer before whom
the foregoing proceedings were taken, do hereby
certify that any witness(es) in the foregoing
proceedings, prior to testifying, were duly sworn;
that the proceedings were recorded by me and
thereafter reduced to typewriting by a qualified
transcriptionist; that said digital audio recording of
said proceedings are a true and accurate record to the
best of my knowledge, skills, and ability; that I am
neither counsel for, related to, nor employed by any
of the parties to the action in which this was taken;
and, further, that I am not a relative or employee of
any counsel or attorney employed by the parties
hereto, nor financially or otherwise interested in the
outcome of this action.



BRETT TORRENCE

Notary Public in and for the
State of New Mexico

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I, KEARA CONTARTESI, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



KEARA CONTARTESI

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