

June 25, 2014

Senator Mark A. MacDonald, Chair
Legislative Committee on Administrative Rules
State of Vermont General Assembly
115 State Street
Montpelier, VT 05633

Re: 14-P14, Health Benefits Eligibility and Enrollment (HBEE) proposed rule

Dear Senator MacDonald:

Please accept this statement from Delta Dental Plan of Vermont d/b/a Northeast Delta Dental regarding LCAR's consideration of the Agency of Human Service's proposed rule, "Health Benefits Eligibility and Enrollment" (14-P14).

Northeast Delta Dental's primary interests in this rule are to ensure that it accurately applies the relevant federal and State laws and that it recognizes and reflects the operational and pragmatic realities of issuers' procedures and systems, given that those systems interact daily with Vermont Health Connect's systems to effectuate subscribers' enrollments and premium payments. Such interaction between the State's and issuers' systems is new ground, and has required considerable discussion and review.

Great effort has been exerted and considerable time spent on the part of many to craft an administrative rule that addresses the complex eligibility, enrollment and payment requirements for individuals and groups enrolling in health and dental coverage on Vermont Health Connect (VHC). Due to the many layers of complexities, and because the implementation of the Affordable Care Act itself continues to evolve, this rule is "final" in title only. As additional system functions are added, e.g., the implementation of the Small Employer Health-Benefits Program planned for 2015, the rule will need to evolve to address these changed circumstances. Therefore, we support the State's decision to continue working throughout this summer on Part Six of HBEE, the section covering Small Employer Health-Benefits Program, in order to produce and file proposed language that reflects the needs of small employers, employees, and issuers, as well as the State's goals for VHC.

Thomas Raffio, FLMI
President & CEO
Northeast Delta Dental
One Delta Drive
PO Box 2002
Concord, NH 03302-2002

Telephone: 603-223-1000
Fax: 603-223-1299
E-mail: TomRaffio@nedelta.com



Northeast Delta Dental submitted comments on the rule to the State. Most of our remaining concerns will be addressed again during the upcoming discussions on the Small Employer Health-Benefits Program section of the rule.

The State representative with which Northeast Delta Dental recently has worked most closely in this rule-making process is Devon Green. Her attention to detail, competence and professionalism have been noted and appreciated. We look forward to continuing to work with her on the Small Employer Health-Benefits Program rules.

Sincerely,



Thomas Raffio
President and CEO

cc: Representative Richard J. Marek, Vice Chair
Senator Peg Flory
Representative Patsy French
Senator Robert M. Hartwell
Representative Bob Krebs
Representative Linda K. Myers
Senator Diane Snelling
Theo Kennedy, Otis and Kennedy