

MEMORANDUM

TO: William J. Lippert, Chair, House Committee on Health Care

FROM: Cory Gustafson, Commissioner, Department of Vermont Health Access

DATE: March 1, 2018

RE: H.696 An act relating to establishing a State individual mandate

Thank you for the opportunity to review and provide feedback on Draft 1.2 of H.696 on a requirement to maintain minimum essential coverage. DVHA suggests the following with respect to this draft:

1. Section 1. Except for (4)(A)(v) and/or (4)(B)(ii) and (iii), remove definitions (2) through (4) and insert a cross reference to the same in the Internal Revenue Code and/or implementing regulations. This would address potential confusion related to the characterization of separate individual and small group market coverage (since they are merged in Vermont), and clarify that this bill maintains the status quo with respect to the definition of MEC except for short term limited duration coverage and other coverage to be recognized by DFR.
2. Section 2. Confirm (not necessarily in bill text) that (b)(8) should be read to only include issuers of medical QHPs (and not the standalone dental QHP issuer).
3. Section 2. Amend working group scope in (c) to include alternative enforcement mechanisms to standard financial penalty.

