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June 14, 2024

Senate Committee on Health and Welfare
Vermont State House
115 State Street
Montpelier, VT 05633-5301

Dear Chairperson Lyons and Honorable Committee Members:

MVP Health Care (“MVP”) strongly supports legislation that would delay the effective date of limited sections in Act 111 until January 1, 2026. Specifically, new requirements requiring commercial health insurance use of and alignment with Medicare claims edit standards are complex. This complexity is exacerbated by the 2025 commercial health insurance product and rate approval timeline, which is already underway. For your reference, 2025 Vermont Health Connect product offerings were submitted in April, and proposed rates were submitted to the Green Mountain Care Board on May 13. Act 111 was signed into law on May 20.

A one-year delay of these limited sections would allow the markets to best deliver on the legislative intent of Act 111, which is administrative simplification and alignment of complex claims edit standards/rules and requirements across markets and payers. A delay will give stakeholders and regulators necessary time to coordinate on any needed guidance and to ensure that implementation happens in a way that minimizes confusion for health care providers and consumers.

Thank you for your time and consideration of this important change.

Sincerely,

A handwritten signature in blue ink that reads "Jordan T. Estey".

Jordan T. Estey
Senior Director, Government Affairs
MVP Health Care