



February 27, 2026
Cigna Healthcare

Chair Black and Members of the House Committee on Health Care

RE: H.583 An act relating to health care financial transactions and clinical decision making, as amended

Chair Black and Members of the House Committee on Health Care:

The Cigna Group is a global health company, focused on the health and vitality of those we serve. Through our two divisions, Cigna Healthcare and Evernorth Health Services, we are committed to enhancing the lives of our clients, customers, and patients. Cigna participates in the large group commercial insurance market and works with in-state hospitals, physicians, and behavioral health providers to ensure covered members have access to services to achieve positive health outcomes for our members.

As an organization seeking the best methods to serve our members, we have both operational and fundamental policy concerns with the amendment 1.2 to H.583 that was posted February 2, 2026. We understand that continued work is being done by interested parties to come up with compromise language during Town Meeting break, and would like our concerns to be considered.

The inclusion of pharmacy benefit managers (PBMs) and health insurers in the definition of "health care entity" is onerous. The intent of the bill is to focus on health care providers, facilities, and provider organizations. The inclusion of PBMs and insurers broadens this bill beyond the scope of health care facility ownership. We understand the concerns with private equity interest in local health care facilities. However, bringing publicly traded PBMs and insurers under the same definition in this Chapter will prohibit our ability to do business in Vermont.

The prohibition to exist in Vermont as of January 1, 2027, is contained in Subchapter 2, paragraph (2), in which "ownership of a health care entity [PBM or insurer] by a for-profit entity other than a professional corporation organized pursuant to 11 V.S.A. chapter 3 or 4 or a professional limited liability corporation organized pursuant to 11 V.S.A. § 4011(g), to the extent such ownership is permitted under federal law". As an insurer that covers over 80,000 Vermonters, we have grave concerns that this prohibition will disrupt the care of our members.

MDLive is a virtual care company that is owned by Evernorth, which is the health services subsidiary of The Cigna Group. MDLIVE provides virtual medical, behavioral health, and dermatology services that are offered to many health plans and employers—including, but not limited to, Cigna-insured members. The proposed amendment would eliminate the PC-MSO model we use where MDLive provides



administrative support (such as billing, credentialing, technology platform, etc.) to providers and whereby the providers control patient care. The relevant language is in Section 9533, paragraphs (a)(1)(B), (b), and (c).

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Lastly, I want to raise concerns with Subchapter 4, Section 9541, in which the information requested in the reporting is not considered “confidential, proprietary, or a trade secret”. As a publicly traded company that goes through many mergers and acquisitions, we are under strict Federal oversight and would ask that any reporting to Vermont align with Federal reporting requirements.

We appreciate that the Committee is considering their options and that this bill will continue to be refined to hopefully find compromise among stakeholders. I appreciate the opportunity to voice our concerns for our consideration as you move forward.

Best Regards,

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