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**State of Vermont**  
**Department of Financial Regulation**  
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**VIA ELECTRONIC MAIL**

February 13, 2025

Sen. Virginia Lyons, Chair  
Senate Committee on Health and Welfare  
Vermont State House  
115 State Street  
Montpelier, VT 05633-5301

Dear Senator Lyons,

The Department of Financial Regulation (Department) supports H.31, *An act relating to claim edit standards and prior authorization requirements*. H.31 addresses ambiguities with Act 111 of 2024 relating to application to healthcare providers outside of Vermont and the definition of “primary care provider.” The Department, along with other health insurance stakeholders, provided input to legislative counsel in drafting H.31, and does not recommend any further changes at this time.

Please let me know if you have any additional questions.

Thank you,

/s/ Emily Brown (she/her)  
Deputy Commissioner of Insurance

cc:  
Jennifer Carbee, Legislative Counsel

