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January 3, 2018

Chair Kevin Mullin  
Green Mountain Care Board  
89 City Center  
Montpelier, VT 05602

Re: Affordable Care Act Insurance Market Impacts

Dear Chair Mullin:

Bi-State Primary Care Association appreciates the opportunity to provide comment on potential changes to Vermont's commercial insurance market.

Established in 1986, Bi-State is a nonpartisan, nonprofit 501(c)(3) charitable organization that promotes access to effective and affordable primary care and preventive services for all, with special emphasis on underserved populations in Vermont and New Hampshire. Bi-State's 12 Vermont Federally Qualified Health Centers, delivering primary care at 63 sites, serve over 172,000 patients. Bi-State's Rural Health Clinic members and Vermont's Coalition of Clinics for the Uninsured (VCCU) each care for over 8,000 Vermonters as well. Planned Parenthood of Northern New England (PPNNE) provides wide-ranging services to over 18,000 Vermonters each year.

Bi-State's Vermont members: FQHCs, PPNNE, Rural Health Clinics, and VCCU are safety-net providers and care for any patient, regardless of ability to pay. They care for the uninsured, underinsured, and offer services ranging from primary medical care, to mental health and addiction services, to dental services, along with enabling services that support the individual wherever they are and with their specific needs. These providers are also facing a series of federal funding reductions that will impact their already precarious financial status.

Modifications to commercial insurance in Vermont will have the potential to increase or decrease the number of uninsured and underinsured and impact both the care to the individual and the financial health of the providers delivering that care. We support commercial insurance market policy changes that minimize the number of uninsured and promote affordability and access to services for all Vermonters.

Below, we provide specific comments on the topics requested by the Green Mountain Care Board and are happy to provide additional information at any time:

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Uninsured: Vermont's Federally Qualified Health Centers (FQHCs) provide care to over half of Vermont's uninsured. Serving over 12,000 uninsured patients each year, Vermont's FQHCs provide medical homes for these individuals regardless of ability to pay and offer a sliding fee scale for services. Vermont's Coalition of Clinics for the Uninsured provide free care and navigation services to 8,000 Vermonters each year. Planned Parenthood, which serves over 1,000 uninsured patients annually, also cares for individuals regardless of ability to pay offering a sliding fee scale. 7% of Grace Cottage's patients are uninsured. In total, Bi-State's members serve the majority of Vermont's uninsured.

Underinsured: Vermont's Bi-State members serve a significant number of underinsured Vermonters each year. Health care services are not always covered and/or affordable and through sliding fee scales, free care, and other charitable actions, Bi-State's members enable individuals to receive much needed care without the fear of accruing significant medical debt.

Commercial Insurance Market Changes: Vermont's safety-net providers care for a significant portion of uninsured and underinsured Vermonters. Increases in Vermont's uninsured and underinsured will put additional pressure on the financial status of these providers. We request that any insurance market adjustments mitigate premium and cost-sharing increases and policy changes do not increase bad debt and free care burdens.

Bi-State's Vermont members are willing and able to care for all Vermonters who seek services, however, they need resources to offset sliding fee scales and other charitable care. Thank you again for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink, appearing to read "gm", followed by a horizontal line.

Georgia J. Maheras, Esq.  
Director, Public Policy Vermont  
Bi-State Primary Care Association, Inc.