



September 27, 2022

Donna Jerry
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

RE: Certificate of Need Exemption Request for Medicare Advantage HMO product offerings for Humana Wisconsin Health Organization Insurance Corporation

To Green Mountain Care Board:

Humana Wisconsin Health Organization Insurance Corporation (HWHO) intends to submit an application for licensure to be admitted as a foreign insurer for Medicare Advantage HMO product offerings in your state. Upon licensure approval, it is HWHO's intent to begin product offerings in 2024 in the proposed service area counties in Vermont to be approved by the Center for Medicare and Medicaid Services (CMS). HWHO will also market this product to groups interested in providing retiree benefits to Medicare eligible retirees. Given that HWHO is not seeking to build any facilities in Vermont and will have no Humana employed associates in Vermont, instead relying on a contracted provider model to provide care to Vermont members, the company is requesting a certificate of need 'no jurisdiction letter' from the Green Mountain Care Board.

HWHO was incorporated on June 4, 1985 in Wisconsin and has been licensed as a Health Maintenance Organization by the Wisconsin Office of the Commissioner of Insurance since August 1, 1985. HWHO has successfully marketed HMO plans in Wisconsin for over 30 years. Presently, HWHO holds an active license for Medicare HMO product offerings in more than 20 states.

HWHO intends to market primarily through agent representatives employed and appointed by its affiliate, Humana MarketPOINT, Inc, a licensed agency in Vermont. The local Director of Sales will be responsible for the coordination of marketing efforts. The Director will develop annual sales goals and budgets, administer compensation programs, hire additional sales staff as needed and direct sales efforts. Sales staff will be responsible for the development of leads and presentations to employer groups and Medicare eligible individuals. Enrollment and customer service representatives located in one of the service centers owned by Humana Insurance Company will assist in the enrollment of new members.

HWHO's primary office is located at Two Riverwood Place, N19W24133 Riverwood Drive, Suite 300, Waukesha, WI 53188-1145. The principal operating facilities of Humana Inc. are located in Louisville, KY; Green Bay, WI; Tampa Bay, FL; Cincinnati, OH; and San Juan, PR all of which are used for customer service, enrollment, and claims processing. Humana Inc.'s corporate headquarters is located in Louisville, KY.

As part of the Humana Inc. holding company system, HWHO has access to the staff of Humana Inc. and its affiliated subsidiaries. To this end, there are over 43,000 employees of Humana Inc. and its subsidiaries that have experience in the activities of administering health insurance products. We will be able to capitalize on the expertise of the staff of affiliate subsidiaries through inter-company service agreements.

Should you have any questions or require additional information to complete your review of this certificate of need exemption request, I can be reached via phone at 502.476.6503 or email at mbailey@humana.com.

Sincerely,

Michael Bailey

Michael Bailey
Manager - Health Plan Licensure
Humana Inc.
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