

**Green Mountain Care Board**  
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*Anya Rader Wallack, Ph.D., Chair*  
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*Georgia Maheras, Executive Director*

October 10, 2012

**By E-mail**

Falko Schilling  
Consumer Protection Advocate  
Vermont Public Interest Research Group  
141 Main Street, Suite 6  
Montpelier, VT 05602

Re: Comments to GMCB Proposed Rule 2.000: Rate Review

Dear Falko:

I am writing on behalf of the Green Mountain Care Board to thank you for submitting comments regarding the Board's draft proposed health insurance rate review rule. We appreciate the time and attention that you and your office have contributed to the rulemaking process. I have enclosed a redline reflecting the changes recommended by staff and approved by the Board that resulted from our review of all comments received as of the September 12 public comment deadline.<sup>1</sup>

In order to address your concern about adequate opportunity for meaningful public comment on rate review filings, we have revised the draft rule to incorporate your proposed change to Section 2.200(c). The draft rule now reads:

**(c) Written Comments to the Board. The Board will accept written comments on rate requests as follows:**

- (1) For rate increases of 5% or less, the Board will accept written comments up to fourteen days from the date of posting to the Board's website ~~up to five business days prior to the hearing date scheduled by the Board pursuant to Section 2.302(b) of these Rules.~~**
- (2) For rate increases of more than 5%, the Board will accept written comments up to fourteen days from the date of posting to the Board's website beginning after the Department's 21-day comment period has**

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<sup>1</sup> The enclosed redline contains the following minor edits made since the Board's approval: (1) § 2.302, first line: comma added after "pleadings"; (2) § 2.304, third line: "Section 2.303" changed to "Section 2.302"; (3) § 2.404, fourth sentence: capitalized each instance of the word "Party" or "Parties"; and (4) § 2.404, fifth sentence: added "with" before "one-inch margins."

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~~expired up to five business days prior to the hearing date scheduled by the Board pursuant to Section 2.303(b) of these Rules.~~

Again, thank you for your comments and for the time and energy you and your office are putting into the rate review process. Please feel free to contact me with questions or anything you would like to discuss further.

Sincerely,

s/ Mike Donofrio

Mike Donofrio

General Counsel, GMCB

(802) 828-4892

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Encl.

cc: Georgia Maheras, Executive Director, GMCB  
Judy Henkin, Director of Health Policy, GMCB

