



September 5, 2024

Karma Lombard
Maine Bureau of Insurance
34 State House Station
Augusta, Maine 04333

Re: Rule 850 – Health Plan Accountability

Dear Ms. Lombard:

Thank you for this opportunity to comment on the proposed amendments to Rule 850 – Health Plan Accountability. MaineHealth is in strong support of the development of clearly defined access standards. Absent such standards, consumers are provided with no clarity regarding their right to access primary and specialty care under their insurance plans. We further strongly encourage the Bureau to engage in major substantive rulemaking on this topic, including a public hearing and reasonable comment period, in order to develop clear standards that will best support access to care and create strong patient protections. As we work to expand access to care for our patients, adequate network access is critical to ensure that patients can receive primary and specialty care within a reasonable time and distance.

We have one recommended change to the rule as proposed: for Section 7.G.3, we would encourage the Bureau to make the effective date be the provider's first date of service or the date of the completed application, whichever is older.

Thank you again for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Katie Fullam Harris".

Katie Fullam Harris
Chief Government Affairs Officer