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**Northern Light Health**  
Acadia Hospital  
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C.A. Dean Hospital  
Eastern Maine Medical Center  
Home Care & Hospice  
Inland Hospital  
Maine Coast Hospital  
Mayo Hospital  
Mercy Hospital  
Northern Light Health Foundation  
Northern Light Pharmacy  
Sebasticook Valley Hospital

September 5, 2024

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

Subject: Proposed Amendments to Rule Chapter 850 – Health Plan Accountability

Dear Ms. Lombard,

On behalf of Northern Light Health and our member organization I thank you for the opportunity to comment on proposed amendments to Rule Chapter 850 – Health Plan Accountability. As noted in the public announcement the proposed changes implement new laws and federal requirements.

Our comments focus on one section of the rule B.2.a. Network Adequacy.

Publication by Superintendent. The Superintendent shall specify the standards required for network adequacy and the exception process in a published bulletin. The standards, including the criteria that must be satisfied to obtain an exception, may not be inconsistent with the federal requirements for qualified health plans as set forth in regulations and guidance issued by the United States Department of Health and Human Services. The Superintendent shall review the bulletin at least annually and revise it if the Superintendent determines that revisions are necessary, including but not limited to any revisions necessary to remain in conformance with federal regulations and guidance

The title of this section does state “Publication by the Superintendent” but the proposed language strikes the word “published” in reference to the bulletin. This creates confusion regarding public access to the bulletin that specifies standards for network adequacy and the exception process. We strongly believe the network adequacy bulletin must be publicly available. We recommend that this section of the rule be amended to state that the bulletin and all associated materials shall be posted on the Bureau of Insurance website. This codifies the current practice of posting bulletins on the website into the network adequacy rule.

We look forward to reviewing the updated information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lisa Harvey-McPherson".

Lisa Harvey-McPherson RN, MBA, MPPM  
Vice President Government Relations