

Green Mountain Care Board Rate Filing Procedures

The following procedures relate to correspondence and submission of documents in health insurance rate filings under 8 V.S.A. § 4062 and 18 V.S.A. § 9375(b)(6). These procedures are subject to revision and do not supersede Green Mountain Care Board Rule 2.000 or the Board's standing Confidentiality Order (revised July 2014).

Rate Filing Correspondence:

1. Each Party¹ to a filing must designate a central contact for the filing and provide contact information for all individuals to be copied on filing-related correspondence.
 - a. The Applicant² must provide the required information at the time it submits a rate filing to the Board. The Advocate³ must provide the required information at the time it files a notice of appearance with the Board.
 - b. Parties are encouraged to send all correspondence through their central contact and to set up a group email address for their contacts.
 - c. Designation of contacts and contact information should be emailed to Christina McLaughlin at christina.mclaughlin@vermont.gov.
 - d. Parties must update their contact lists as needed throughout the filing.
2. Parties must copy the Board's rate review team on filing-related correspondence:
 - a. Michael Barber, General Counsel – michael.barber@vermont.gov
 - b. Laura Beliveau, Staff Attorney – laura.beliveau@vermont.gov
 - c. Tom Crompton, Health Finance Systems Assoc. Dir.
- thomas.crompton@vermont.gov
 - d. Christina McLaughlin, GMCB Health Policy Analyst
- christina.mclaughlin@vermont.gov

Rate Filing Submissions:

1. *Combining PDFs* - When Parties upload a response to an inquiry letter in SERFF, response documents in PDF form shall be combined into one PDF file.
2. *Providing PDFs of non-PDF documents* - Parties shall provide a PDF copy of any document that is not a PDF file (for example, Excel documents) for extraction from SERFF to post on the Board's website.
3. *Excel Documents* - Excel documents filed with the Board and served on Parties shall have all formulas intact.
4. *Designating Confidential Material*
 - a. All documents containing **unredacted** confidential material (approved as confidential or requested as confidential) shall:

¹ Defined in GMCB Rule 2.000, § 2.103(h).

² Defined in GMCB Rule 2.000, § 2.103(b).

³ Defined in GMCB Rule 2.000, § 2.103(a).

- i. Include “CONFIDENTIAL” in the document name.
 - ii. Include “CONFIDENTIAL” in the email subject line.
- b. All documents containing **redactions** shall include “REDACTED” in the document name.
- c. Confidential material in documents shall be marked as follows:
 - iii. *Unredacted documents* – Where entire pages or portions of a page are confidential (or where confidentiality is requested), the page containing the designated material shall include a footer that clearly indicates the page contains confidential material. The designated material shall be marked with light blue highlight or with “unapplied” marked redactions (see below):

This is confidential material.

- ii. *Redacted documents* - Confidential material in a redacted document shall be blacked out (not deleted) so that the unredacted and redacted versions of the document are the same length.
- 8. *Submission of Confidential Material*
 - a. Materials designated as confidential shall be sent by email to the Board’s rate review team, with a cc’ to the Advocate and the Board’s contract actuaries.
 - b. A request for confidentiality shall:
 - i. Clearly designate the specific material claimed as confidential (*see above instructions on designating confidential material*). Broad claims of confidentiality and claims that are addressed to entire records or documents, such as data sets, are not likely to be sufficiently specific to support requests for confidential treatment.
 - ii. Provide a detailed explanation supporting its claim, including reference to the applicable provision(s) of 1 V.S.A. § 317(c) or any other law.
 - iii. Include an unredacted copy of the document containing confidential material (*marked as discussed above*).
 - iv. Include a redacted copy of the document containing confidential material.
 - c. Unredacted confidential materials should not be submitted through SERFF.
 - i. If a document has both confidential and non-confidential material, a redacted copy must be submitted into SERFF. An updated redacted copy must be submitted to SERFF if the Board does not approve confidentiality for all requested material.
 - ii. If a Party is requesting an entire document be treated as confidential but the Board does not approve confidentiality for the entire document, a redacted copy must be submitted into SERFF.
 - d. Parties may password protect documents submitted in connection with a filing but shall only use one password per filing.
 - e. Parties are encouraged to review Board guidance on confidentiality requests available at <https://ratereview.vermont.gov/Glossary> and prior Board confidentiality approvals in previous filings prior to submitting confidentiality requests.

