

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re:)	
Cigna Health and Life Insurance Company)	GMCB-010-24rr
Large Group Filing)	SERFF: CCGP-134244586
)	

**HCA SUGGESTED QUESTIONS FOR
CIGNA HEALTH AND LIFE INSURANCE COMPANY**

The Office of the Health Care Advocate (HCA) suggests the following questions to the Green Mountain Care Board (GMCB) to pose to Cigna Health and Life Insurance Company (CHLIC).

1. In the most recently approved form filing, CHLIC committed to the Vermont Department of Financial Regulation “to take action to no longer implement Tier 4 plans” in Vermont. However, the rate filing contains multiple references to 4-Tier drug plans.
 - a. Please state whether the proposed rates are reflective of CHLIC’s commitment to no longer implement Tier 4 plans in Vermont.
 - b. Please describe the steps CHLIC has taken to inform sales and account teams about these changes.

2. CHLIC is required by Vermont law to submit its “specialty tier formulary list” to the GMCB in conjunction with a rate filing. 8 V.S.A. § 4062(b)(2)(A)(ii). We note that the 2025 “specialty tier formulary list” submitted with this rate filing spans 3,849 rows, which is 1,505 rows longer than the 2024 list.
 - a. Please provide a detailed explanation of the changes made between the 2024 and 2025 lists.
 - b. Which drugs or formulations were added?
 - c. Which drugs or formulations were dropped?
 - d. Which drugs or formulations changed tiers?

3. The drugs on the 2025 specialty formulary list are each assigned to a drug tier identified by the numerals 1, 2, 3, or 4.
 - a. If CHLIC is no longer offering 4 Tier plans in Vermont, what is the status of the Tier 4 drugs?
 - b. Describe the methodology CHLIC uses for determining which drugs to include on the Vermont specialty formulary list, when only a small number of those drugs are placed in the Tier 4 “specialty” drug tier?

4. Is the SaveonSP program described in Table 48 available to Vermont groups?

- a. If so, describe in detail how the program “enabl[es] customers to use more manufacturer assistance.” CHLIC Rate Filing at 87.
- b. Who are the “customers” referred to — plan sponsors (i.e. employers) or subscribers (i.e. employees)?
- c. Does CHLIC or SaveonSP classify certain high-cost drugs as “non-essential health benefits” then facilitate the beneficiary’s drawn down of the maximum available manufacturer assistance? Describe in detail how this process works.
- d. Is the full amount of manufacturer assistance applied to a beneficiary’s deductibles and out-of-pocket maximums?
- e. If not, how is the program consistent with Vermont law which requires all payments made by or on behalf of a covered person to count toward out-of-pocket costs? 18 V.S.A. § 3612(e)(2); 8 V.S.A. § 4089j(d)(2)(F).

Dated in Montpelier, Vermont, this 21st day of October 2024.

/s/ Charles Becker
Charles Becker, Esq.
Office of the Health Care Advocate
Vermont Legal Aid
1085 U.S. Route 4, Suite 1A
Rutland, VT 05701
Voice (802) 775-0021 ext. 435
HCAraterreview@vtlegalaid.org

/s/ Eric Schultheis
Eric Schultheis, Ph.D., Esq.
Office of the Health Care Advocate
Vermont Legal Aid
56 College Street
Montpelier, VT 05602
Voice (802) 223-6377 ext. 325
HCAraterreview@vtlegalaid.org

CERTIFICATE OF SERVICE

I, Charles Becker, hereby certify that I have served the above HCA Suggested Questions for Cigna Health and Life Insurance Company on Michael Barber and Laura Beliveau at the Green Mountain Care Board and upon Allison Behrens, noticed contact for Cigna Health and Life Insurance Company for this matter, by electronic mail, delivery receipt requested, this 21st day of October 2024.

/s/ Charles Becker
Charles Becker
Staff Attorney
Office of the Health Care Advocate
Vermont Legal Aid
1085 U.S. Route 4, Suite 1A
Rutland, VT 05701