



December 12, 2016

Karynlee Harrington  
Acting Executive Director  
Maine Health Data Organization  
151 Capitol Street  
102 State House Station  
Augusta, ME 04333-0102

Dear Karynlee,

I am writing on behalf of the Maine Association of Health Plans (MeAHP) to respond to MHDO's request for comments on proposed changes to Rule Ch. 243. MeAHP shares the concerns expressed by both Anthem Blue Cross and Blue Shield at the public hearing and by Aetna in their letter of November 29<sup>th</sup>, 2016.

As written, the proposal only exempts licensed TPAs, not licensed carriers acting as TPAs. Maine law does not require that carriers be licensed as TPAs to administer self-funded plans so technically the exception wouldn't cover plans that do.

We request that the proposed rule be amended to clarify that carriers who are not licensed TPA's but provide only administrative services for self-funded ERISA plan sponsors are exempt from the rule's reporting requirements.

Thank you for the opportunity to comment. Please contact me with any questions.

Sincerely,

Katherine D. Pelletreau  
Executive Director