

From: [Van Fleet, Anna](#)
To: [Matthews, Jolie H.](#)
Subject: MDL-171 definition of indemnity revision
Date: Thursday, May 26, 2022 2:53:37 PM

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Hi Jolie,

Here are Vermont's comments regarding the redlined changes to definition of indemnity:

These proposed changes broaden the definition of indemnity to match the excepted benefit rules for individual coverage. Vermont uses this regulation to regulate group supplemental health insurance as well. If any state used it for that purpose perhaps a drafting note should be added to address that these standards are designed for individual insurance and that the group excepted benefit rule should be consulted for states using this regulation for group insurance. 45 CFR 146.145

Thank you,

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