



August 28, 2020

Superintendent Eric A. Cioppa
State of Maine
Department of Professional and Financial Regulation
Bureau of Insurance
34 State House Station
Augusta, Maine 04333-0034

Delivered via Electronic Mail to: Susan.P.Tardiff@maine.gov

Re: Maine Rule Chapter 210 – Standards for Pharmacy Benefit Managers

Dear Superintendent Cioppa,

Mitchell and Coventry recently merged and together form one of the leading providers of pharmacy services in the workers' compensation and auto industries. Our services to these industries significantly differ from similar business models serving commercial and government health plans.

We support the distinction recognized by Mr. Wake at the recent public hearing on this issue, with respect to the differences between workers' compensation and commercial health PBMs. That said, we would like to provide some feedback with respect to the licensing responsibilities as discussed in the proposed rulemaking, as it applies to workers' compensation/auto PBMs, as follows:

Licensing Reporting Requirements

As mentioned by several stakeholders at the hearing, we respectfully request Sections 4 Part B(2)(b) and B(3) be stricken from the proposed language. As a national carrier, we work hard to maintain compliance in all fifty states. However, administrative or clerical errors are still likely to occur, causing delays in licensing, registration, or reporting requirements for a state. This occurrence is extremely rare, so we request the Department acknowledge the requirement is burdensome for the stakeholders and remove the requirement.

Workers' Compensation Abbreviated PBM Registration

We do understand from Mr. Wake's comments at the hearing that an "...abbreviated application process" will be forthcoming from the state, that will be more appropriate for Workers' Compensation PBM licensing, that will eliminate the vast majority of the substantive requirements that the commercial health plan PBM's will be subject to. We are currently in the process of obtaining our PBM license with the state. We look forward to partnering with the state going forward to develop a new licensing framework, and would be more than willing to provide input into the format and contents.

If you have any questions on the aforementioned comments, or if you need any additional information on our business as a workers' compensation/auto PBM, please feel free to contact me at bickfordl@cvty.us.com , or by phone to (916) 224-1163.

Best regards always,



Lisa Anne Bickford

Director, Government Relations, Coventry

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