

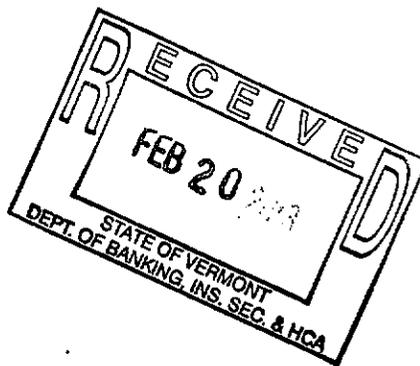
## **Exhibit 10**

**DAVID FASSLER, M.D.**

**86 LAKE STREET, BURLINGTON, VERMONT 05401**

February 15, 2013

Susan Donegan  
Commissioner  
Department of Financial Regulation  
89 Main Street  
Montpelier, VT 05602



Dear Commissioner Donegan,

We represent a broad cross section of mental health clinicians practicing throughout the state of Vermont. We are writing in support of the petition submitted by the Vermont Health CO-OP to establish and maintain a Consumer Operated and Oriented Health Plan. It is our understanding that the CO-OP has been organized as a non-profit health insurance issuer, with the intent to offer health plans through Vermont Health Connect.

We have had the opportunity to discuss the plans, philosophy and goals with the leadership of the CO-OP. We are pleased with their commitment to honor both the spirit and the letter of Vermont's parity statutes by developing a comprehensive statewide network of mental health and substance abuse clinicians to facilitate access and promote integration with general medical care. Even at this early organizational stage, the CO-OP has made an effort to reach out to the clinical community in a collaborative and inclusive manner. For this reason, we would like to support the application currently under review by your Department. We believe the Vermont Health CO-OP would represent a welcome addition to the limited insurance alternatives currently available for Vermonters.

Regards,

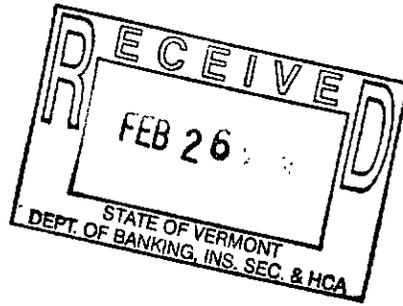
David Fassler, M.D.

On behalf of :

Alice Silverman, M.D.  
Ann E. Reynolds, Psy.D.  
C. Scott Earisman, M.A., LCMHC, LADC  
Diane Tetrault, MA, LCMHC  
Susan Hall, M.A.  
Rick Barnett, Psy.D., LADC

Joyce Dion, LICSW  
Annie Ramniceanu, MS, LCMHC, LADC  
Judith Markey, Psy.D.  
Sandra K. Howell, M.S.  
Vermont Mental Health Counselors Association  
Vermont Psychological Association

February 22, 2013



Commissioner Susan L. Donegan  
State of Vermont  
Department of Financial Regulation  
89 Main Street  
Montpelier, Vermont 05602-3101

Dear Commissioner Donegan:

Please consider this a letter as an indication of my support of licensure for the Vermont Health COOP. At a time when Vermont is transforming its health care delivery system, we need to be sure that we have health insurance carriers that will focus on lower costs and products that are desired by its members. The Vermont Health COOP can provide the necessary competition and dedication to ensure that administration costs are low, providers are paid based on outcomes and Vermonters are engaged.

I believe in my local food coop because of its short and long terms vision and for the high level of responsibility they have to their members. Each year the members have the opportunity to weigh in, shape policies and product offerings. This is a model that resonates with Vermonters and a model that would be beneficial within Vermont's health insurance market.

I appreciate the efforts of Vermont to address health care costs at the same time being mindful of the quality of patient outcomes.

Sincerely,

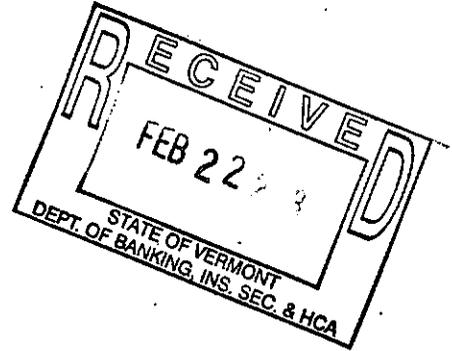
A handwritten signature in black ink that reads "John W. Valente". The signature is written in a cursive style with a long, sweeping underline.

John Valente  
Ryan, Smith & Carbine



Since 1934

## Vermont Grocers' Association



February 22, 2013

Commissioner Susan L. Donegan  
State of Vermont  
Department of Financial Regulation  
89 Main Street  
Montpelier, Vermont 05602-3101

Dear Commissioner Donegan:

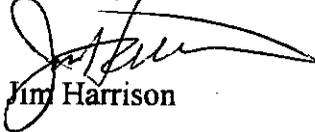
*On behalf of the members of the Vermont Grocers Association, I am writing a letter to support licensure of the Vermont Health COOP. Our association has been active in the health care debate for more than two decades. Throughout that time, our members have had a very consistent message; lower premium costs, eliminating the cost shift, provide choices and insurance plans that meet the needs of members.*

During the Legislative session we asked for small business options outside the health insurance exchange. While we were unsuccessful with that message, we do believe that the new Vermont Health COOP offering plans on the exchange will at least provide more competition and choice within the insurance market.

Additionally, several of our members are Vermont food CO-OP's. We know firsthand the value that they bring to their members and the marketplace.

The COOP model provides a good and viable option to the marketplace, which will be crucial to Vermont's success. We support the licensure of the Vermont Health COOP so that more Vermonters have insurance coverage and choices in the marketplace.

Sincerely,



Jim Harrison

**Chieffo, Ryan**

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**From:** Donegan, Susan  
**Sent:** Thursday, February 28, 2013 10:18 PM  
**To:** Chieffo, Ryan  
**Subject:** Fwd: VT CO-OP

Add to docket.

*Susan L. Donegan, Commissioner  
VT Dept. Financial Regulation  
Sent from my Verizon Wireless 4G LTE DROID*

----- Original Message -----

**Subject:** VT CO-OP  
**From:** Tom Golonka <[tomgolonka@comcast.net](mailto:tomgolonka@comcast.net)>  
**To:** "Donegan, Susan" <[Susan.Donegan@state.vt.us](mailto:Susan.Donegan@state.vt.us)>  
**CC:** [dfr.compliance@state.vt.us](mailto:dfr.compliance@state.vt.us)

February 28, 2013

Commissioner Susan L. Donegan  
State of Vermont  
Department of Financial Regulation  
89 Main Street  
Montpelier, Vermont 05602-3101

Dear Commissioner Donegan:

It was my intention to attend the public hearing in support of the Vermont Health CO-OP in Williston on March 1<sup>st</sup> but I am on vacation with my family. I would however like to express my full support for the licensing of the Vermont Health CO-OP.

As a businessman, City Councilor and father, I believe that the model and vision of a cooperative will be extremely valuable within the health care insurance arena. I believe very strongly in local control and providing consumers with choices. Additionally, I believe that the Vermont Health CO-OP will have the ability to provide plan offerings and premium costs that would be most suitable for my family while adding the element of competition in the insurance market.

I appreciate the efforts of Vermont to try to transform our current system into one that is more transparent, reduces costs and improves patient outcomes. All Vermonters will be better served if the state achieves these goals. Again, I fully support the Vermont Health CO-OP as a licensed insurance carrier in Vermont.

Sincerely,

Thomas Golonka  
Silver Lake Wealth Management

Sent from my iPad

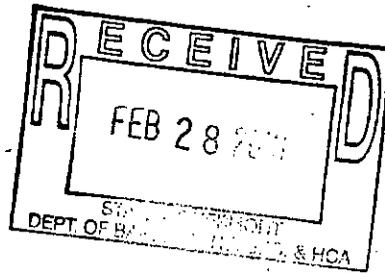


# Middlebury

James H. Douglas  
*Executive in Residence*

Middlebury College  
Munroe 301  
Middlebury, Vermont 05753

Phone : 802.443.5549  
jdouglas@middlebury.edu



March 1, 2013

Department of Financial Regulation  
Montpelier, VT 05609

Dear folks,

I write to support the application for licensure of the Vermont Health CO-OP. Consumer Operated and Oriented Plans are an important part of the federal Patient Protection and Affordable Care Act (ACA), which will extend access to healthcare to more Americans.

The Vermont Health CO-OP will provide Vermonters with a new option to be insured by a company of which they are owners. In addition, the CO-OP is committed to significant and innovative payment and delivery system reform and, unlike its competitors, would be required to reinvest surplus revenue in lowering its members' premiums, improving their health or expanding their coverage. As such, the CO-OP would represent an important, non-traditional option that Vermonters could choose through the Exchange.

Vermont's history is rich with the success stories of member-owned and member-governed organizations. I have little doubt that, given the opportunity to serve Vermonters, the Vermont Health CO-OP will soon be among the most significant and transformative of these success stories.

I urge you to license the Vermont Health CO-OP.

Thank you for your consideration.

Sincerely,

James H. Douglas  
Governor of Vermont  
2003-2011

STORROW · BUCKLEY · HUGHES, LLP  
ATTORNEYS AT LAW  
26 State Street  
Suite #8  
Montpelier, VT 05602-2943

802-229-4900

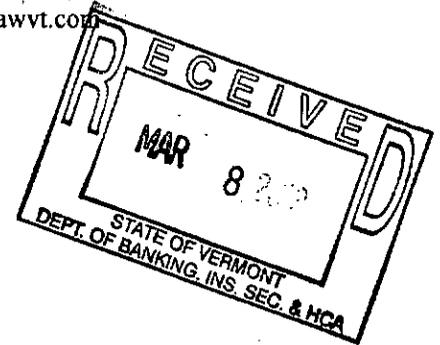
Fax: 802-229-5110

Sender Email: [jhughes@sbhlawvt.com](mailto:jhughes@sbhlawvt.com)

Web Page: [www.sbhlawvt.com](http://www.sbhlawvt.com)

Charles F. Storrow  
Clare A. Buckley  
Jacqueline A. Hughes

Daniel C. Burke



March 7, 2013

Commissioner Susan L. Donegan  
Department of Financial Regulation  
89 Main Street  
Montpelier, Vermont 05602

Re: Petition of Proposed Vermont Health CO-OP, Inc. for Certificate of Public Good and Domestic Mutual Insurance Company License, Docket 12-041-I

Dear Commissioner Donegan:

I appreciate the opportunity to provide written comments on the licensing application for the establishment of the proposed Vermont Health Coop (CO-OP). My client, BCBSVT has asked me to monitor these proceedings so I have been reviewing the CO-OP's licensing process and materials on its behalf. A number of specific questions have been asked of me in connection with this process, and since I can find nothing in the public record that addresses them – and since I believe they are relevant to the determination of whether the CO-OP will promote the “general good” of the state of Vermont -- I offer them to you for consideration as part of your review process.

- What assurances can the CO-OP offer that, if licensed, its members will have adequate statewide and out-of-state networks of providers so they can be confident they will have coverage for medical care where and when they need it? The public testimony was that the proposed CO-OP had agreements with two related Vermont hospitals. We question whether this is sufficient progress for licensure, especially given the heavy reliance of the initial exchange plan designs on network services to make the actuarial valuations work for the average purchaser, the facts that not all covered members of a family may live in Vermont nor are all medically necessary covered services available here.
- To assure that potential members can expect that the CO-OP's functions and operations will be tested and reliable, will the state require, as contemplated by 8 V.S.A. § 3305, that someone at the organization have previous and relevant insurance experience (we think this contemplates more than just experience in insurance sales)? Will the state allow

substitution of contractors' insurance experience for experience within the organization itself? What requirements will the state establish to assure the CO-OP is functionally sound if and when it begins to solicit members?

- In its marketing and public relations activities the CO-OP has maintained that one of its defining characteristics (and its evidence of general good) is not only its non-profit status but that it would keep members' health insurance dollars in Vermont. This benefit was promoted by both Gov. Peter Shumlin and Rep. Peter Welch, who participated in the CO-OP's ribbon cutting and whose participation was cited by the CO-OP during the recent public hearing on its license request. The public record provides little information about its staff and no information on the vendors that the CO-OP has developed for most of its core, functional operations, so it is difficult to assess this important aspect of the CO-OP's claim to promote the general good of the state. Will the CO-OP's claims processing be done in state? If not, where will that work and the associated jobs be located? Will the CO-OP's customer service functions be located in Vermont? If not, where will that work and the associated jobs be located? Will the CO-OP's medical cost management programs be administered in Vermont? If not, where will that work and the associated jobs be located? We ask these same questions about all of the CO-OP's core functional areas, including actuarial and underwriting work; IT development and maintenance; enrollment and billing; quality programs; pharmacy benefit management; etc.
- Consistent with the questions above, it appears that the CO-OP has already begun marketing activities in Vermont through the Fleischer Jacobs Group (FJG), a Burlington-based professional insurance agency. The proposed CO-OP's Chairman of the Board and incorporator is President of FJG. Is there a contractual relationship through which the proposed CO-OP has hired FJG as its marketing agent? If the marketing is being outsourced, how is that process being overseen to assure that it is conducted in the best interests of future members?
- The CO-OP's license request comes at a time in which it is the explicit policy of the state of Vermont to dramatically change and perhaps eliminate the role of private payers in Vermont's health care system within the next few years. What is the CO-OP's rationale for requesting federal ACA loans to create an infrastructure that may be displaced before the CO-OP has been in business long enough to repay either of its loans?

Thank you for considering my comments.

Sincerely,

Jacqueline A. Hughes