



Retired Public Employees of Alaska, APEA/AFT

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RPEA Comments to the DRB Draft Rewrite of the Retiree Insurance Information Booklet

RPEA has reviewed the 2019 draft rewrite of the Retiree Insurance Information Booklet. Below are our general concerns which are the same as were submitted previously in August:

1. The draft is based on the 2018 Retiree Insurance Information Booklet (Sept. 2018) which itself is a rewrite of the 2003 Retiree Health Plan Insurance Book. As a consequence, it includes provisions that have been added since 2014 which are in dispute in the medical diminishment and DVA lawsuits;
2. The draft continues to specifically identify Aetna and adopt its Clinical Policy Bulletins in the provisions of the revised draft in the medical coverage and benefits. It also specifically identifies Delta Dental and includes the Moda plan;
3. In all cases, for the Medical, DVA and LTC plans, references should be to either 'TPA' or 'claims administrator' rather than to Aetna, Delta Dental, Moda or any other specific TPA;
4. Because the 2018 and the 2019 drafts are being imposed prematurely—before the lawsuits are completed—the costs associated with the rewrite, adoption and publication of these drafts using retirement trust funds is inconsistent with DOA's fiduciary duties as the plan administrator;

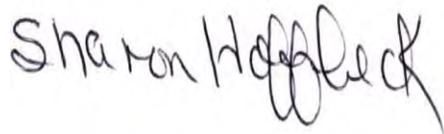
5. DOA has not performed any adequate or appropriate equivalency analysis of the changes it has imposed to these plans beginning in 2014 through the present.

A revised Insurance Information Booklet should not be printed and distributed until there has been a final determination as to whether those changes comply with the Alaska Constitution and the requirements of the *Duncan v. RPEA* opinion.

If DRB wants to make the coverage and benefits easier to navigate and understand, then RPEA suggests it make non-substantive organizational changes to an on-line version of the Booklet until the court cases are finally resolved.

Furthermore, we urge that in furtherance of its fiduciary duties to Alaska's retired public employees, DRB take appropriate steps to alert AlaskaCare Retiree Plan beneficiaries which benefit changes DRB has imposed since 2013 that are currently being challenged in the Alaska courts.

Sincerely,



Sharon Hoffbeck
President



Brad Owens
Executive Vice President