



TESTIMONY TO MASSACHUSETTS GOVERNMENT: SIMPLIFY THE HIRD FORM

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MY TESTIMONY: SIMPLIFY THE HIRD FORM RULES

1. THE DIVISION OF HEALTH CARE, FINANCE, AND POLICY (THE "DIVISION") HELD PUBLIC HEARINGS ON SEPTEMBER 5. ON BEHALF OF CLIENTS, I TESTIFIED AND OFFERED COMMENTS URGING SIMPLIFICATION.

[My written comments are at this link.](#)

If you are a Massachusetts employer, you hopefully are aware by now that the Division issued emergency regulations on June 20 and published an initial HIRD (Health Insurance Responsibility Disclosure) Form.

Employees who decline health insurance coverage, and part-time employees who reject use of employer cafeteria plans to pay the full cost of their coverage, must answer 5 questions and sign the forms. Employers must obtain signatures and retain forms for three years.

The deadline to get employee signatures, in most cases, is September 30. If you do not know what a HIRD Form looks like, here is a link to earlier articles written on [July 14, 2007](#) and [August 22, 2007](#). Within them are copies of the Employee HIRD Forms (in English, Spanish, and Portuguese), and a link to the emergency regulations.

2. WHY BOTHER WITH TESTIFYING?

I would like to see more access to health care. However, it is not good policy for Massachusetts to overburden employers. They are already regulated to the hilt by the federal government, and most Massachusetts employers already provide health insurance.

Those of you with human resource responsibilities know that the current version of these HIRD forms is too complicated for the average (and above-average) employee. So I took advantage of the public hearing to put on record my concerns, and suggestions. I hope the Division listens.

I do note that the Commissioner of the Division (Sarah Iselin) and her staff seem genuinely concerned to do the job correctly. I'm somewhat optimistic that they will respond with a simpler version of the Employee HIRD Form and procedures.

GOOD NEWS.

THE DIVISION DID SIMPLIFY THE HIRD FORM AFTER THAT HEARING.

[HERE IS AN UPDATE ON THE NEW FORM.](#)

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