



An Roinn Gnóthaí Eachtracha agus Trádála
Baile Átha Cliath 2

Department of Foreign Affairs and Trade
Dublin 2

19 February 2017

The Health Insurance Authority
Canal House
Canal Road
Dublin 6

**Re: Department of Foreign Affairs & Trade submission to the Health Insurance Authority
review of the Lifetime Community Rating regulations**

Dear Sir/Madam,

Please find enclosed the Department of Foreign Affairs & Trade submission's to the Health Insurance Authority review of the Lifetime Community Rating (LCR) regulations. I also refer to the numerous meetings and discussions which officials from my Department have had with the Health Insurance Authority regarding the impact the introduction LCR has had on the international health insurance policy operated by the Department of Foreign Affairs & Trade on behalf of all Government Departments who assign officials for periods abroad.

The Department of Foreign Affairs & Trade has responsibility for administering foreign assignments for officials from all Government Departments who are assigned to serve the State for periods abroad. The impact that the introduction of LCR has on officials and family members who accompany them on postings is a matter of serious concern to my Department, to other Departments and State Agencies who assign people for periods abroad, and quite understandably to staff themselves.

Irish officials serve the State in a variety of roles abroad, including staffing our network of 80 Missions. Ireland also assigns officials to serve for periods in important positions within European and international institutions. Filling these roles is crucial in allowing the Government advance the State's interests. The need to fill these roles is all the more pressing now given the increasingly uncertain and challenging European and global environment in which we operate.

It is wholly unreasonable that officials willing to serve the State abroad, often in difficult and challenging locations, face an open-ended financial penalty on their ability to access health insurance on their return to Ireland, compared to officials who do not undertake assignments abroad on behalf of the State. It has long been a basic principle that officials should not be disadvantaged directly as a result of undertaking a posting abroad. Furthermore, this Department has received legal advice that the State would be liable for such costs.

I am deeply concerned that a failure to resolve the issues which have arisen following the introduction of LCR for officials who serve the State abroad will act as a significant disincentive to staff to undertake these assignments abroad at a time when Ireland needs to be fully engaged in promoting and defending its interests.

In addition to the issue of liability for loadings incurred by officials directly as a result of serving the State abroad, I am also concerned that the current situation poses a wider risk to the Exchequer. We have always encouraged staff to take out the international health insurance policy. The Department has secured a large up-take of the policy, not least because of the reassurance it has provided to officials/dependents of seamless re-entry into the domestic system on their return. We have a duty of care to those we assign abroad, and their accompanying family members. It is in the Exchequer's interest that they are adequately insured.

I ask that you give detailed consideration to the points made in the attached submission. I know that officials from this Department will also be meeting with the Authority to discuss the matters raised. I firmly believe that it is in the interests of both the State and our staff that the inequitable anomalies which have arisen following the introduction of LCR are speedily resolved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Niall Burgess', with a long horizontal flourish underneath.

Niall Burgess
Secretary General