



February 22, 2024

Mr. Timothy Schott, Acting Superintendent  
c/o Karma Lombard  
Maine Bureau of Insurance  
34 State House Station  
Augusta, ME 04333-0034

Karma.Y.Lombard@maine.gov

Re: 2025 Clear Choice Standardized Plan Designs

Dear Mr. Schott:

Thank you for the opportunity to share our comments with respect to the proposed 2025 Clear Choice Plan designs.

➤ **Proposed Elimination of Plans**

It is our understanding that the Bureau is proposing to eliminate the following plans:

- Bronze \$5900 HSA
- Silver \$3000
- Silver \$5500

The Silver \$5500 plan has significant membership. As a result, we strongly suggest that this plan be retained to avoid member disruption and abrasion.

We would also note that the Silver \$3,000 plan is very popular with small group purchasers and suggest that this plan be retained as well for the same reasons.

We believe that developing a range of Clear Choice plan designs better allows carriers to offer plans that meet the needs of both the individual and small group market segments. We do not object to the elimination of the Bronze \$5900 HSA plan, but we believe that is the only plan that should be eliminated. If, however, the Bureau feels that it is necessary to eliminate additional plans to reduce the number of Clear Choice plans overall, we believe it is more important to retain the Silver \$5500 over the Silver \$3000. However, as noted above we believe both plans have value in the marketplace and should be retained.

Finally, it is our understanding that nothing prohibits members enrolled in a discontinued plan from being mapped to an alternative plan if that is the closest plan offered.

➤ **Changes to Plans**

It is also our understanding that the Bureau is proposing the following changes to the remaining plans:

- The Deductible and Maximum Out of Pocket (“MOOP”) for the Catastrophic Plan will be reduced from \$9450 to \$9200
- The MOOP for the Bronze \$9450 will be reduced to \$9200 and the cost sharing for the freestanding urgent care benefit will be changed from deductible/coinsurance to a \$60 copay
- The MOOP for the Bronze \$7500 is being reduced to \$9200
- Silver \$3500—the MOOP will be reduced from \$9100 to \$8500, and the specialist co-pay is being reduced from \$80 to \$60
- Silver \$4200
  - The MOOP will be reduced from \$9100 to \$8000
  - The overall coinsurance is being reduced from 40% to 30%
  - The PCP/BH co-pay is being increased from \$35 to \$40
  - The specialist co-pay is being reduced from \$80 to \$60
  - The Tier 1 Rx co-pay is being increased from \$20 to \$25
  - Tier 3 and 4 Rx cost sharing is being changed from \$100 and \$200 co-pays to 30% and 50% coinsurance.
- Silver HSA \$4000 deductible is being reduced to \$3500

While we have no objection to the proposed changes, we note that the proposed transition of the Silver \$4000 plan to \$3500 will result in premium increase for those enrolled in that plan.

➤ **Pediatric Dental**

We ask the Bureau to clarify the requirements around pediatric dental for catastrophic plans. It is our understanding that the federal requirements applicable to catastrophic plans provide that all pediatric dental services, including diagnostic and preventive services, are subject to the medical deductible. This is consistent with how the Catastrophic plans were offered in Maine prior to the introduction of Clear Choice plans. It is also consistent with how the benefit is offered on Catastrophic plans in 12 of the 13 other states in which Anthem plans are offered, the only exception being Kentucky. It is my understanding that Kentucky has a mandate requiring coverage before the deductible.

In addition, the Clear Choice chart indicates that Catastrophic plans have the same coinsurance for pediatric dental as on the other metal levels; however, since the deductible and the Maximum Out of Pocket are the same for Catastrophic plans, it is not possible to have any cost-sharing after the deductible--any service covered after the medical deductible in that situation would be Covered in Full after deductible has been met since the MOOP has also been met.

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Thank you for the opportunity to share these comments, and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, reading "Kristine M. Ossenfort". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kristine M. Ossenfort, Esq.  
Senior Government Relations Director