

January 30, 2025

Ms. Karma Lombard

Maine Bureau of Insurance
34 State House Station
Augusta, ME 04333-0034
Karma.Y.Lombard@maine.gov

Re: 2026 Clear Choice Standardized Plan Designs

Dear Ms. Lombard:

On behalf of Anthem Health Plans of Maine, Inc., d/b/a Anthem Blue Cross and Blue Shield, I would like to thank you for the opportunity to share our comments with respect to the proposed 2026 Clear Choice Plan designs, and offer the following comments:

1. Proposed filing deadlines

The Timeline shared by the Bureau indicates that form filings will be due in May with rate submissions due in early June.

This represents a departure from past practice and accelerating the deadline for form filings is of significant concern to us. Under a best-case scenario, the Clear Choice plan designs will not be finalized until sometime in February. There is a significant amount of work that needs to be completed internally prior to the submission of the filing, and we are concerned that we will not have sufficient time in which to complete that work—in order to meet a May filing deadline, we would need the final clear choice designs around February 14, 2025.

Furthermore, this appears inconsistent with the requirements of Rule Chapter 940, Section 6(B), which requires that rates and forms be submitted at the same time:

Every policy, rider, or endorsement form affecting benefits which is submitted for approval must be accompanied by a rate filing or, if the form does not require a change in the premium, the submission must include a complete explanation of the effect on the anticipated loss ratio. The rate filing must include all rates, rating formulas, and revisions. ***Rates must be filed with the form rather than separately.***

2. Standardized CSR Plan Designs

While we understand the desire to standardize the CSR plans, we suggest that carriers should continue to be afforded the flexibility to create their own CSR plan designs. The proposed plans are quite different from the current plans that we offer, resulting in significant disruption to the member. For example, the plans currently offered by Anthem have lower deductibles than the proposed standardized plans. Furthermore, as the Bureau noted,

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“further analysis is needed to determine changes that should be made to other plan characteristics. As a result, we would suggest that any effort to standardize the CSR plan designs be delayed until plan year 2027 and a stakeholder group be convened in the interim to look more closely at this issue.

With respect to the specific plan designs proposed, however, we have the following comments and suggestions:

- The Silver \$3,500 and Silver and the Silver \$4,400 for CSR 87% have the same deductible—we would suggest that the deductibles be different to allow more consumer choice.
- Similarly, the coinsurance is the same for those same two plans—we would again suggest that they be different in order to provide for more choice. We also suggest avoiding odd amounts such as 27%—most consumers are more accustomed to seeing 25%, 30%, etc.

3. Naming Conventions

In the past, plans have been required to include “Off Marketplace” in the plan name, but there was no mention of such a requirement this year. Is this going to be required again this year and, if so, must it use the phrase “Off Marketplace” or is it acceptable to use abbreviations such as “Off MP”?

Thank you once again for the opportunity to share these comments and please do not hesitate to contact me if you have any questions or would like additional information.

Sincerely,



Kristine M. Ossenfort

Senior Government Relations Director