



William Steinbock
Community Health Options
60 Pineland Dr.
Suite 301 Auburn Hall
New Gloucester, ME 04260

January 30, 2025

Robert L. Carey
c/o Karma Lombard
Maine Bureau of Insurance
34 State House Station
Augusta, ME 04333

Re: Clear Choice Plans 2026 Proposal

Dear Superintendent Carey:

Thank you for the opportunity to offer comments on the proposed Clear Choice plans that would be available on- and off-Exchange in Maine in 2026.

Community Health Options performed an analysis to inform recommendations on the inputs for services not outlined in the proposal for CSR plans. We recommend making slight adjustments to the proposed deductible, coinsurance, and maximum-out-of-pocket to accommodate the inputs for other services and to meet applicable actuarial value requirements. To illustrate these recommended revisions to the Silver 3500 and Silver 4200 CSR variants, we've included an Excel file entitled *2026 CSR Variant_Recommendations_01232025* with these comments.

In 2026, we would appreciate clarity on naming conventions related to CSR plans. Specifically, we are seeking confirmation from the Bureau of Insurance concerning whether carriers may change the name of their CSR plans to match the CSR driven deductibles/maximum-out-of-pocket amounts so that the new accumulators are featured in the plan name. Clarity on this point could help ensure consistent naming practices while providing consumers with greater ease in comparing products across carriers.

Thank you again for providing this opportunity to share comments and please do not hesitate to contact me if you have any questions.

Sincerely,
William Steinbock
Manager, Compliance & Regulatory Affairs