

February 20, 2024

## Harvard Pilgrim Health Care Comments

RE: Clear Choice Plan Designs for Individual and Small Group 2025

Thank you for the opportunity to provide comments on revisions to 2025 Clear Choice plan designs for the individual and small group. The following comments and questions represent Harvard Pilgrim Health Care's thorough review of the proposed 2025 plan designs.

### Comments

- We recommend lowering the coinsurance on the 3500 plan. The 4200 plan has lower coinsurance, at 30%. Changing the coinsurance from 40% to 30% for the 3500 plan increases the AV only slightly to 70.51%.
- We find that the market favors \$5,000 deductible plans. We propose a plan design with a higher deductible to replace the \$4,200 plan. Offering a higher deductible plan in place of the \$4,200 plan will help reduce the gap in premium for members who are currently enrolled on a \$5,500 plan. Several options work in the AV calculator, for example, using the current \$5,500 plan as a starting point, lowering the deductible to \$5,000 and the OOPM to \$8,000 would have an AV of 70.05%.

### Questions

- During the February 7th public comment session, it was stated that only three Clear Choice Plans that were removed from 2025 proposed plan options. However, according to our data four plans removed: the Silver \$3,000, Silver \$5,500, Silver \$4,000 HSA, and the Bronze \$5,900 HSA. Could you please clarify which plan designs were removed?
- The Silver \$3,500 HSA plan is not indicated as an off-marketplace plan offering like the \$4,500 HSA. Is this because the AV value is above 70%? This plan will not be considered an HSA plan on CSR plans and we are concerned this may lead to confusion. We recommend limiting this deductible option to off-marketplace only.
- Please clarify the approximate timing when the new rating areas will be finalized and should we assume the new area 3 will become 3S and 3N?
- Are carriers able to increase coinsurance above 50% on Tier 2 Tiered plans?

- Are carriers allowed to market small group (off-marketplace) and individual (on-marketplace) plans that have different cost share values on T2 benefits such PCP? For example, small group – T2: PCP \$25 vs. T2: PCP \$20.

Thank you for the opportunity to provide this feedback and request for clarification as you complete your review of the 2025 merged market Clear Choice plan designs.