

From: Houle, Michele B
To: Lombard, Karma Y
Cc: Duberowski, Michael D
Subject: Gold 2500 Clear Choice Plan
Date: Thursday, January 16, 2025 3:53:09 PM

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Hi Karma,

The proposed Gold 2500 Clear Choice plan for 2026 is out of AV tier when we run the plan through the AV calculator.

I ran a few different scenarios to bring the plan in AV tier.

Option 1 PCP and Behavioral Health from \$20 to \$25, deductible \$2500, oopm \$5400 = 81.90%

Option 2 PCP and Behavioral Health from \$20 to \$30, deductible \$2500, oopm \$5300 = 81.83%

Option 3 PCP and Behavioral Health from \$20 to \$25, deductible \$2700, oopm \$5300 = 81.91%

Option 4 PCP and Behavioral Health from \$20 to \$30, deductible \$2600, oopm \$5200 = 81.92%

Option 5 PCP and Behavioral Health from \$20 to \$35, Chiropractic/rehab occupational/physical/speech therapy from \$30 to \$35, deductible \$2750, oopm \$5000 = 81.91%

Please let us know if any of these plan designs would work for 2026.

Thank you,

Michele Houle

Actuarial Consultant, Actuarial Pricing, East Region
UnitedHealthcare Employer & Individual

Thanks,

Michele

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From: Duberowski, Michael D
To: Lombard, Karma Y
Cc: Houle, Michele B
Subject: Comments Regarding 2026 Clear Choice Standardized Plan Designs
Date: Wednesday, January 15, 2025 2:40:08 PM

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Hi Karma,

Thank you for accepting written comments regarding the proposed 2026 Clear Choice standardized plan designs.

I wanted to take this time to express concerns regarding carriers offering tiered plan designs that do not follow the design requirements of the Clear Choice standardized plan designs. In many cases, these tiered plans have tier 2 deductibles and coinsurance designs that do not meet the requirements of the Clear Choice standardized plans. If the Bureau of Insurance is determined to require standardized plans, all carriers should be required to follow the requirements of the standardized plans.

The purpose of the Clear Choice standardized plans is to make the experience easier on consumers and allow them to compare identical plans when shopping for health plans. Allowing carriers to have tiered benefits at whatever cost sharing they desire diminishes the purpose of standardized plans, since plan offerings are no longer identical.

Furthermore, if carriers are not required to follow these standardized plans, what is preventing a carrier from putting one small hospital into tier 1, and having all other care covered under tier 2? This would allow for a carrier to offer any benefit structure that they choose – quite possibly at a significantly reduced rate. It would also allow carriers to offer significantly more plans than the limited amount allowed under the Clear Choice proposal.

This concern was also addressed last year by a joint statement between the American Heart Association, the Leukemia & Lymphoma Society, the Consumers for Affordable Health Care.

We recommend that the BOI require carriers to offer benefits that match the Clear Choice Plan Designs in 2026. If the BOI feels that tiered plans are appropriate, we believe that separate tiered plans should be set up by the BOI with standardized tier 1

and tier 2 benefits.

Thank you for taking the time to address these concerns.

Thank you,
Mike Duberowski

Michael Duberowski FSA, MAAA
Director, Actuarial Pricing, Northeast Region
UnitedHealthcare Employer & Individual

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