



MAINE ASSOCIATION
OF
HEALTH PLANS

November 29th, 2021

Mr. Eric Cioppa, Superintendent
Maine Bureau of Insurance
34 State House Station
Augusta, ME 04333-0034

Dear Superintendent Cioppa:

I am writing in response to the Bureau's request for comments at last week's Clear Choice meeting for interested parties. Stakeholders were asked to provide written comments to be considered at the subsequent meeting. We appreciate the Bureau's scheduling of another meeting so soon after the first and a third not long after. As you know, one of our greatest concerns both last year and this one is the timeline.

Several of our member carriers indicated their concerns about timing at last week's meeting. The concerns are both with the timing of the finalization of Clear Choice Plans and the merged market decision. These two sets of decisions are linked.

Clear Choice plans must be finalized **at least** three months prior to rate filings being due. Two plans indicated that three months in advance was the drop-dead date, and they would prefer sooner, in February. A decision on merging the markets must be made well before that, by the end of the year if at all possible.

If it is not, Plans will be forced to build twice the number of rates to accommodate scenarios with and without a market merger. Details around MGARA's attachment points and pay out levels as well as how risk adjustment will be applied will also need to be figured out so carriers know how to incorporate these factors.

I would also like to amplify the comments offered about [CoverME.gov](https://www.coverme.gov). The Plans remain genuinely concerned that the site is not allowing good plan comparison. They do not like the way options are presented and sorted, and have real problems with the site's

representation of network participation. They report that there are fundamental flaws in the algorithm being used to populate the site (it is supplied by a vendor called "Checkbook").

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Katherine D. Pelletreau". The signature is written in black ink and is positioned above the printed name.

Katherine D. Pelletreau

Cc: MeAHP Board of Directors