

Draft 2020 Plan Certification Standards

September 13, 2019



- **September 1, 2019**
 - Request for stakeholder input and timeline memorandum
- **September 13, 2019**
 - Stakeholder preview of draft standards
- **September 19 – 27, 2019**
 - Stakeholder Sessions
- **October 1, 2019**
 - Deadline for stakeholder input into draft standards
- **October 15, 2019**
 - MHBE Board of Trustees session

2020 Policy Priorities for 2020

MHBE requests stakeholder insight on the following priorities:

- **Administrative burden reduction.**
 - Streamlining of the plan certification process.
- **Out-of-pocket cost relief.**
 - Reduction in consumer exposition to out-of-pocket costs at point of service. Of interest includes requirement of certain services before deductible for certain metal level plans. MHBE will also revisit standardized benefit designs as potential option.
- **Maximizing APTC purchasing power.**
 - Dampening the impact of base premium reduction of the Second Lowest Cost Silver Plan (and thereby APTC) due to the State Reinsurance Program. Of interest includes increasing the AV of carrier silver plans that are not the lowest cost silver plans to partially offset any reduction in APTC.
- **Affordability for unsubsidized enrollees.**
 - Reducing premiums for unsubsidized enrollees, maximizing the impact of the State Reinsurance Program. Of interest includes requiring QHP offerings with reduced AV to create attractive options for price sensitive unsubsidized enrollees.
- **Essential Community Providers (ECPs) petition process.**
 - Creation of an ECP petition process to allow providers that are not on the existing ECP list to count as ECPs for the 30% network inclusion standard. Of interest includes eligibility standards for the determination of ECP status through the petition process in Maryland.
- **Maximizing consumer choice – product types.**
 - Offering different product options to consumers to maximize consumer choice. Of interest includes a requirement (or incentive) to offer additional product options if the carrier is authorized to do so and currently offers the product off-Marketplace, in the small group market, or in the state employee health benefits program.

2019 Plan Certification Standard

Applying issuers must attest to meeting their respective requirements under the final network adequacy regulation promulgated in COMAR 31.10.44 Network Adequacy.

Proposed 2020 Plan Certification Standard

No change, incorporated in the Carrier Reference Manual and in regulation.

2019 Plan Certification Standard

Applying issuers attest to submitting provider directory data to MHBE every two weeks. Applying issuers attest that the submitted data is complete, accurate, and up-to-date *under 45 CFR 156.230 (b)*.

Proposed 2020 Plan Certification Standard

No change, incorporated in the Carrier Reference Manual and in regulation.

2019 Plan Certification Standard	Proposed 2020 Plan Certification Standard
Incorporated in the next update of the Carrier Reference Manual.	No change, incorporated in the Carrier Reference Manual and in regulation.
	MHBE proposes to develop a petition process for additions to the Essential Community Providers (ECP) list. MHBE proposes to develop an eligibility process to evaluate submitted petitions. MHBE proposes to develop a timeline for when additions become effective in the determinations of compliance with ECP standard.

2019 Plan Certification Standard	Proposed 2020 Plan Certification Standard
<p>Prescription Drug Certification Standards: The formulary link provided in “Prescription Drug Search” must link directly to the QHP’s list of covered drugs and include tier information. Plans must include a legend to allow the consumer to match the indicated tier with a drug category.</p>	<p>No change, incorporated in the Carrier Reference Manual.</p>
<p>Issuers must track drug exceptions and provide information to MHBE upon request.</p>	<p>No change, incorporated in the Carrier Reference Manual.</p>

2019 Plan Certification Standard	Proposed 2020 Plan Certification Standard
<p>SADP* Rating Cap: Stand Alone Dental Plans must cap rating at three minor dependents. Included in the next update of the Carrier Reference Manual.</p>	<p>No change.</p>
<p>Optional Embedded Pediatric Dental Benefits: Embedded Pediatric Dental Benefits in QHPs are optional. Included in the next update of the Carrier Reference Manual.</p>	<p>No change.</p>

*Stand-Alone Dental Plans

2019 Plan Certification Standard	Proposed 2020 Plan Certification Standard
<p>Employee Choice Expansion (Optional): MHBE proposes an expansion to the employee choice model. Employers may select up to two consecutive metal tiers (e.g. Bronze and Silver, or Silver and Gold) and employees will be able to select any plan between the chosen metal tiers across any issuer. Issuers electing this option must report election to MHBE.</p> <p>Included in the Carrier Reference Manual.</p>	<p>No change.</p>
<p>Employer Choice Composite Rating (Optional): Per MIA Bulletin 15-34, Employer groups in the Employer Choice model may elect to participate in composite rating for either a single QHP offering or multiple QHP from a single carrier. MHBE encourages issuers to offer at least one QHP that will offer composite rating/premium. Issuers must identify the plans to MHBE. Issuers electing this option must report election to MHBE.</p> <p>Included in the Carrier Reference Manual.</p>	<p>No change.</p>

Established Standard	Proposed 2020 Plan Certification Standard
Special Enrollment Period (SEP) Verification: Verification requirements for SEPs due to loss of minimum essential coverage (MEC).	Incorporated in regulation.

QHP/SADP Offering Limitations/Meaningful Difference*

Established Standard	Proposed 2020 Plan Certification Standard
<p>SADP* Tier Limitation: SADPs may not offer more than one dental plan per product per tier.</p>	<p>Carriers may not offer more than four dental plans per product per plan (child-only/family).</p>
<p>QHP Meaningful Difference Standard: MHBE adopts the FFM Meaningful Difference Standard as they pertain standard plan variations.</p> <p>Included in the Carrier Reference Manual.</p>	<p>No change.</p>

*Stand-Alone Dental Plans