

# Letter of Intent to Amend 1332 Waiver

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## Background (1/2)

- Maryland General Assembly passed Access to Care Act (SB705/HB728)
  - Directs MHBE to apply for waiver amendment to allow all residents to enroll on-Exchange, regardless of immigration status (waiver of section 1312(f)(3) of the Affordable Care Act)
- Maryland has an approved section 1332 waiver to facilitate the state reinsurance program through 2028
  - First step of amendment process is to submit a letter of intent to the federal government



## Background (2/2)

- ~112,400 Marylanders are uninsured and ineligible for coverage due to immigration status (~30% of MD uninsured population)
- Currently, individuals ineligible to enroll on-Exchange due to their immigration status are able to purchase full-price health plans off-Exchange
- If waiver amendment is approved, these individuals would be able to enroll in full-price private plans on-Exchange
- Newly eligible individuals under the waiver amendment would not be eligible for Federal or state subsidies

# Benefits of On-Exchange Enrollment

- Simplified shopping experience
  - Plan cost comparison
  - Tools that show whether plans include providers and prescription drugs
  - Total health care cost estimation
- Extensive consumer support
  - Call Center (more than 200 languages)
  - In-person assistance: Navigator Program and authorized brokers
- Streamlined enrollment in the same plan for mixed-status families
  - Continuity of coverage and care coordination
  - Allow families to share single plan deductible and out-of-pocket maximum
  - Reduce burden of managing multiple plans

# Draft Timeline

<b>4/15/2024</b>	<b>Board vote to authorize submission of a letter of intent to amend 1332 waiver</b>
<b>5/3/24</b>	MHBE submits letter of intent
<b>6/3/2024</b>	Federal government responds to letter of intent (up to 30 days)
<b>6/10 - 7/9/2024</b>	Application published on MHBE website; 30-day state public comment period; MHBE to hold two public hearings
<b>7/15/2024</b>	<b>Board vote to submit application</b> ; submit application to federal government
<b>8/29/2024</b>	Federal government determines whether application is complete (up to 45 days)
<b>8/29 - 9/30/2024</b>	30-day Federal public comment period
<b>2/25/2025</b>	Last day for federal approval: federal government may take up to 180 days from determination of completeness to approve an application (MHBE to request decision by the end of 2024)
<b>11/1/2025</b>	Open enrollment starts for plan year 2026; all qualified residents eligible to enroll
<b>1/1/2026</b>	Plan year 2026 coverage begins

# Request for Approval to Submit of Letter of Intent

MOTION: I move to [approve/defer/reject] the submission of a letter indicating MHBE's intent to submit a 1332 waiver amendment application to the U.S. Department of Health and Human Services and Department of the Treasury pursuant to Senate Bill 705 / House Bill 728 of 2024 [as presented/as amended].