

# Proposed Re-enrollment Regulations

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# Background

- MHBE's regulations currently do not address re-enrollment process
- In 2024 Federal regulations were updated to authorize the healthcare.gov to crosswalk eligible Bronze enrollees to Silver Cost-Sharing Reduction (CSR) plans during annual re-enrollment process, if:
  - Silver premium is equivalent or lower
  - Silver plan is within the same product
  - Silver plan has the same provider network
- Optional for State-based Marketplaces

# 14.35.07.23 Proposal

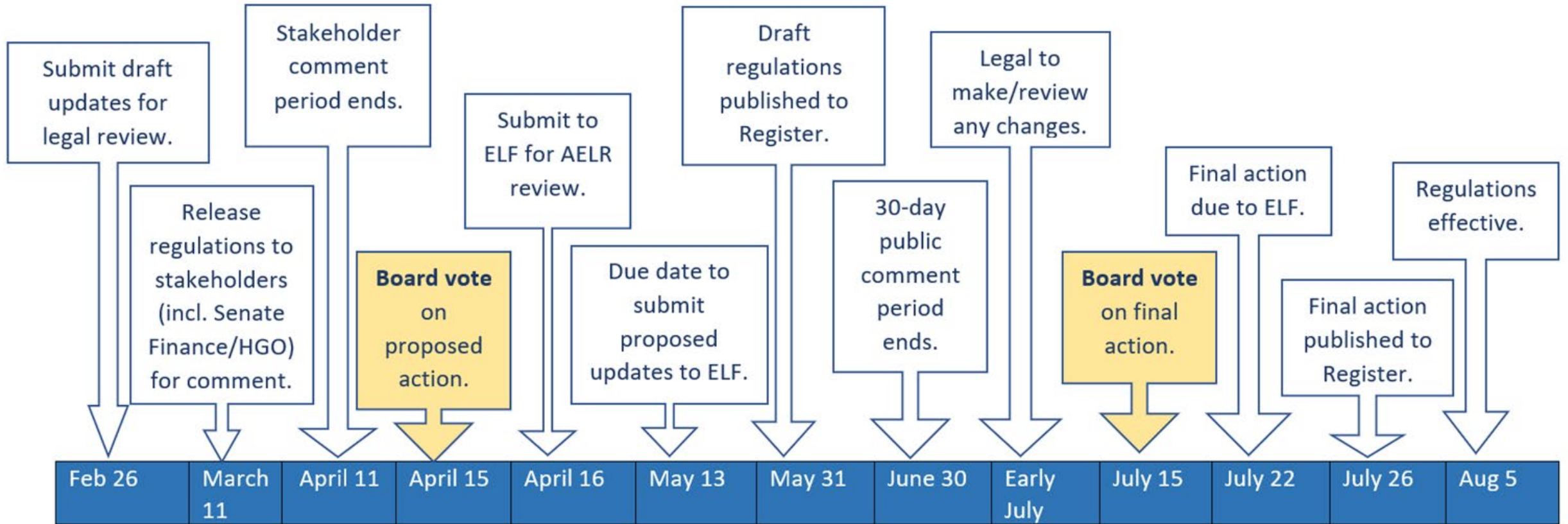
- Codifies existing process for re-enrollment
- Codifies requirement that carriers planning to discontinue plans submit re-enrollment templates
- Establishes process for crosswalking CSR-eligible Bronze enrollees into **higher-value plans**
  - Higher-value plan must be:
    - Within the same product
    - With the same provider network
    - After application of APTC and Young Adult Subsidy, have a premium that is lower or the same as Bronze plan
  - The highest value plan available may be a Silver CSR plan or a **Gold plan**
- **Excludes enrollees in HSA-compatible plans**
- Impact: Approximately 4,300 individuals are currently enrolled in a bronze plan and could be in a higher-value plan at the same or lower premium

*Differences between MHBE proposal for re-enrollment hierarchy and Federal process highlighted in yellow*

# Related Proposals

- Update 14.35.15.05 Conditions for Participation—Authorized Carrier Conduct for consistency with the proposed codification of requirement to submit re-enrollment templates in 14.35.07.23
- Update 14.35.01.02 to define “provider network.” This term is used in the proposal for 14.35.07.23 and throughout MHBE’s regulations

# Timeline



# Request for Approval of Proposed Regulations and Authorization to Submit to AELR and DSD

MOTION: I move to [approve/defer/reject] the proposed regulations as presented, and authorize MHBE to submit them to the Joint Committee on Administrative, Executive, and Legislative Review for review and to the Division of State Documents for publication in the Maryland Register [as presented/as amended].