Plan Management Stakeholders Committee

Thursday, September 4, 2025

Standing Agenda

- Welcome
- Meeting Minutes
- Committee Feedback

Plan Management Updates

Plan Certification

As we near the end of the plan certification period, the following are key dates to remember:

- Carriers should submit final templates by September 12, 2025 (Individual) and September 19, 2024 (SHOP).
- ETA for carrier sign-off (includes actuarial certification) is September 15, 2025. Sign off for Small Group is September 23, 2025. (pending MIA rate approval)
- Plan loading for the individual market is scheduled for September 16, 2025. Plan loading for Small Group is scheduled for September 27, 2025. Carriers will be notified once plans are loaded into production to allow a plan preview period.
- Carrier URLs should be live by Monday, September 29, 2025.

PY2027 Proposed Plan Certification Standards

MHBE anticipates releasing proposed certification standards earlier than scheduled, but no later than the timeline outlined below:

- November 2025 – Draft plan certification standards for 2027 released to carriers.
- January 2026 – Proposed plan certification standards presented to the MHBE Board.
- February 2026 – Finalized standards released (as approved by the MHBE Board).

Timely Reporting of Effectuations

Pursuant to COMAR 14.35.21.06(C), participating issuers must return 834 effectuation files to MHBE within 90 calendar days of the coverage start date. To ensure the state subsidy is distributed accurately and promptly, MHBE will limit state subsidy payments to a maximum of three months retroactively.

Key Takeaways:

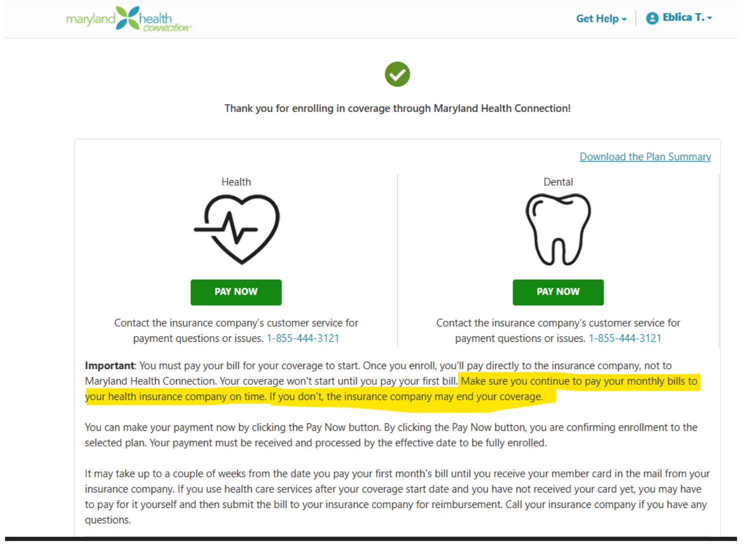
- 834 effectuation files must be received within 90 days of the coverage start date (deadline is inclusive of the 90th day).
- The month in which MHBE receives the effectuation file will count as one of the three retroactive months.
- Implementation is scheduled for December 2025.
- Issuers should not bill a consumer for any portion of the premium not paid by MHBE due to an issuer not sending timely effectuations. Consumers shall be held harmless.

Addition of Auto Pay Text

MHBE will add text to consumers' MHC accounts that reminds them of the option and ease of signing up for auto-pay with their carrier after they complete enrollment. The goal is to facilitate a smoother payment process and help consumers avoid accidentally missing payments.

The goal is to add text during the first quarter of 2026.

Examples of text and placement provided by Kaiser Permanente are below. All carriers can provide input or suggestions by Friday, September 19, 2025.



Option 1
Simplify your life with autopay.
Set it up once, and your monthly payment is made automatically — on time, every time. It's secure, convenient, and easy to cancel anytime.
Contact your health plan's Member Services to get started.

Option 2
Autopay = Less hassle.
Set it and forget it — secure, automatic monthly payments that keep your account current.
Enroll through your health plan's payment portal.

Option 3
Never miss a payment with autopay.
Automatically pay your monthly premium from your bank account or card. You'll stay in good standing and avoid missed payments — with the freedom to cancel anytime.
Get started through your health plan's payment portal.

Upcoming Federal Changes

Background

- June 20, 2025: CMS released [2025 Marketplace Integrity and Affordability Final Rule]
- July 4, 2025: [H.R. 1] (reconciliation bill) signed into law
- Both the reconciliation bill and the CMS final rule are likely to lead to significant enrollment losses and cost/operational burdens on the Marketplace to implement
- Very challenging implementation timelines

Provisions Effective August 25, 2025: Program Integrity Rule

- **Income Verification When Electronic Data Unavailable** – Requires verification of income when electronic data is unavailable (currently can accept attested income). Sunsets Dec 31, 2026.
  Impact: >80,000.
- **Income Verification When Data Sources Indicate Income <100% FPL** – Marketplaces must require consumer to submit income verification documents when a consumer's attested projected income is above 100% FPL, but federal data sources indicate that actual income is below 100% FPL. Sunsets Dec 31, 2026.
- **Eliminates <150% Special Enrollment Period**: The lowest income households will no longer be able to enroll at any point in the year. Sunsets Dec 31, 2026. ***Implemented with a flag to reinstate for PY 2027.***
  Impact: 1000/month currently enroll each month through this SEP
- **Ends 60-Day Extension to Resolve Income Verifications**: Marketplace consumers will no longer receive an automatic 60-day extension to the 90-day period to resolve income-related data matching inconsistencies. ***Implemented***

☑ **DACA Eligibility** – Eliminates DACA recipients' eligibility to enroll on-exchange.
Impact: ~300. ***Implemented***

☑ *Indicates operational impact to MHBE*

Provisions Effective Jan. 1, 2026: Fall 2025 Implementation

Program Integrity Rule

- ☑ **Changes Failure to File and Reconcile Process**: Beginning with the 2026 plan year, marketplaces must deny APTC to a consumer who fails to file federal income taxes and reconcile APTC for one prior year. Made permanent by H.R. 1.
  Impact: Estimated 4,000 Marylanders could lose financial assistance
- **Modifies Premium Adjustment Percentage Index (PAPI):** Changes methodology for calculating the PAPI; will reduce premium tax credits and permit higher cost-sharing for the entire private insurance market, including those with employer-sponsored plans.
- **Allows Insurers to Increase Cost Sharing:** Increases “de minimis” variation permitted at each metal level. *Broader de minimis ranges were not implemented for 2026 individual market plans in Maryland.*
- **Bans gender affirming care as part of Essential Health Benefits**: APTC can’t be used to cover portion of premium attributable to non-EHBs
- ☑ **H.R. 1: Eliminates APTC eligibility for lawfully present immigrants <100% FPL**
  Impact: 20,000

MARYLAND HEALTH BENEFIT EXCHANGE

☑ *Indicates operational impact to MHBE*

Emergency stay of six of the eight CMS Rule provisions

On August 22, a federal District Court judge in Maryland stayed, on a nationwide basis, the implementation of several provisions in the CMS Program Integrity final rule, including the following two below that apply to SBMs and MHBE.

1. **Income Verification When Data Sources Indicate Income <100% FPL**
2. **In addition, the ruling found no statutory basis for CMS’s long-standing “failure to reconcile” (FTR) rules. MHBE’s FTR process during renewals will depend on the legal landscape at the time renewals are processed.**

Enhanced Premium Tax Credits NOT Renewed

- Advanced Premium Tax Credits (APTCs) were enhanced, originally under the American Rescue Plan Act (ARPA) in 2021, then extended by the Inflation Reduction Act (IRA) through 12/31/25.

- The ARPA both a) increased the tax credit amount for those already eligible for tax credits and b) increased the number of those eligible for tax credit by removing the 400% cliff and allowing tax credits at any income where the benchmark plan would be more than 8.5% of income.

- Since May 2021 when tax credits were enhanced, Maryland has seen a 50% increase in the number of those receiving tax credits from 126,000 to 190,000, a +64,000 increase, per the MHBE's monthly data report. (Source: https://www.marylandhbe.com/news-resources/reports-data/)

- Could still get extended this year through separate action by Congress.

Near Term Communication

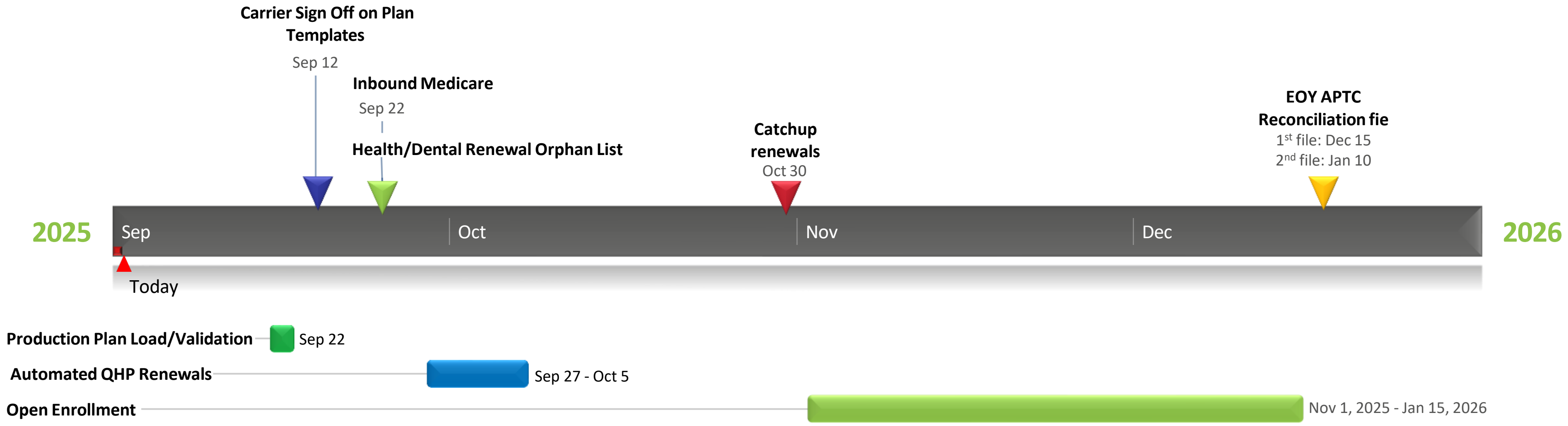
High level communication in near term :

- No changes to 2025 coverage (w/ exception of DACA)
- Use your coverage now
- Your 2026 costs are going up, but Open Enrollment is the best time to look at your options and find the best plan for your budget

PMSC Presentation from MHBE IT

September 4, 2025

2026 Renewals Timeline



CONSUMER ASSISTANCE – OE UPDATES

Updated Broker Counts

- 2004 currently authorized brokers – over 500 more than last year at this time
- 54 brokers in training
- 63 new applications awaiting review
- 415 brokers participating in Broker Connect – 100+ more participants than last year at this time

Other Broker Operations Updates

- BATPhone (Broker Assistance Telephone) planning is underway – Request for Applications issued late August. We plan to have up to 50 participating brokers this year with a schedule by day, as we did last year.

- MHBE implemented a regulation requiring brokers to pass the same Pre-Credentialing Exam that all of the other Consumer Assistance Workers must pass, to be authorized. In addition to Annual Training, we have rolled out this requirement to our currently authorized brokers as well. Brokers must pass the exam prior to 10/24/2025 to remain authorized.

- Meetings & Training Sessions for Brokers:
  - 7/30 – Broker Portal Training
  - 8/20 – August Monthly Broker Operations Meeting – Exam requirement explained
  - 9/11 – Hot Topic Webinar – SADP
  - 9/30 – September Monthly Broker Operations Meeting – Open Enrollment Readiness

Call Center Updates

OE 13 Hours of Operations and Critical

General Business Days - *Hours of Operation*
Saturday, November 1, 2025 to Thursday, January 15, 2026 **Monday through Friday**: 8:00 am – 6:00 pm EST
Critical Business Days – December 2025 & January 2026
December 30, 2025 – Hours of Operation 8am - 8pm **December 31, 2025 – Hours of Operation 8am - 8pm** **January 14, 2026 – Hours of Operation 8am - 8pm** **January 15, 2026 – Hours of Operation 8am - 8pm**

- CSC will be open Veteran's Day, Tuesday, November 11, 2025.
- CSC will be closed to observe Thanksgiving Day, Thursday, November 27, 2025.
    - The day after Thanksgiving, Friday, November 28, 2025, CSC will remain open.
- CSC will be closed to observe Christmas Day, Thursday, December 25, 2025.
    - The day after Christmas Day, Friday, December 26, 2025, CSC will remain open.
- CSC will be closed to observe New Year's Day, Thursday, January 1, 2026.

maximus

Maryland Health Connection
OE12 Media Plan

Campaign Approach

Goals: Increase awareness of Maryland Health Connection and drive enrollment in Qualified Health Plans (QHP) among remaining eligible populations

Target Audience: Uninsured Marylanders, with emphasis on:

- Young adults (19-37 years old)
- Hispanic/Latino Marylanders
- Black Marylanders
- Meta Areas (High Uninsured Zip Codes)

Timing: October 16, 2024 – January 15, 2025

Budget: $2,100,000

Traditional Media Overview

Television

- Baltimore, Hagerstown, & Salisbury – Full DMA Broadcast and Cable
- Washington, DC - Cable only in MD counties
- Spanish language TV on Telemundo and Univision

Radio

- Baltimore, DC, Salisbury - African American radio
- Baltimore, DC - Spanish language radio
- Regular schedules as well as integrations & live remotes using station talent ("halo effect")
- Digital and Social Media promotions

Print

- Baltimore and DC - African-American print
- Baltimore and DC - Spanish Language print
- Special editions where available

Out of Home

- Gig workers - Billboards around Amazon/Walmart warehouses
- Lower income - Dollar General/Family Dollar; Transit Media (bus shelters, bus interiors)
- Older/ethnic - Church bulletins around holidays

Digital Media Overview

- Awareness – Digital video (YouTube, Hulu, Roku, ESPN, Match Media Group) and digital audio (Spotify, SXM Media, iHeart)
- Consideration – Traditional & Native Display ads through programmatic media and direct site placements (The Trade Desk, Zeta, Taboola, Urban One and Match Media Group)
- Conversion – Paid Social including influencers (Meta, LinkedIn, Snapchat, Reddit) and Google paid search.

Paid Media Plan

Week of:	14-Oct	21-Oct	28-Oct	4-Nov	11-Nov	18-Nov	25-Nov	2-Dec	9-Dec	16-Dec	23-Dec	30-Dec	6-Jan	13-Jan
Television: Broadcast/Cable														
Billboards														
Dollar General/Family Dollar														
Transit media														
Church Bulletins														
Print														
Radio														
Digital Video														
Digital Audio														
Display Video														
Social														
Search														

What’s New?

Billboards near Amazon & Walmart warehouses

Church Bulletins

Reddit

Dating App

Whitelisting Micro-influencers

MARYLAND HEALTH BENEFIT EXCHANGE

@MarylandConnect

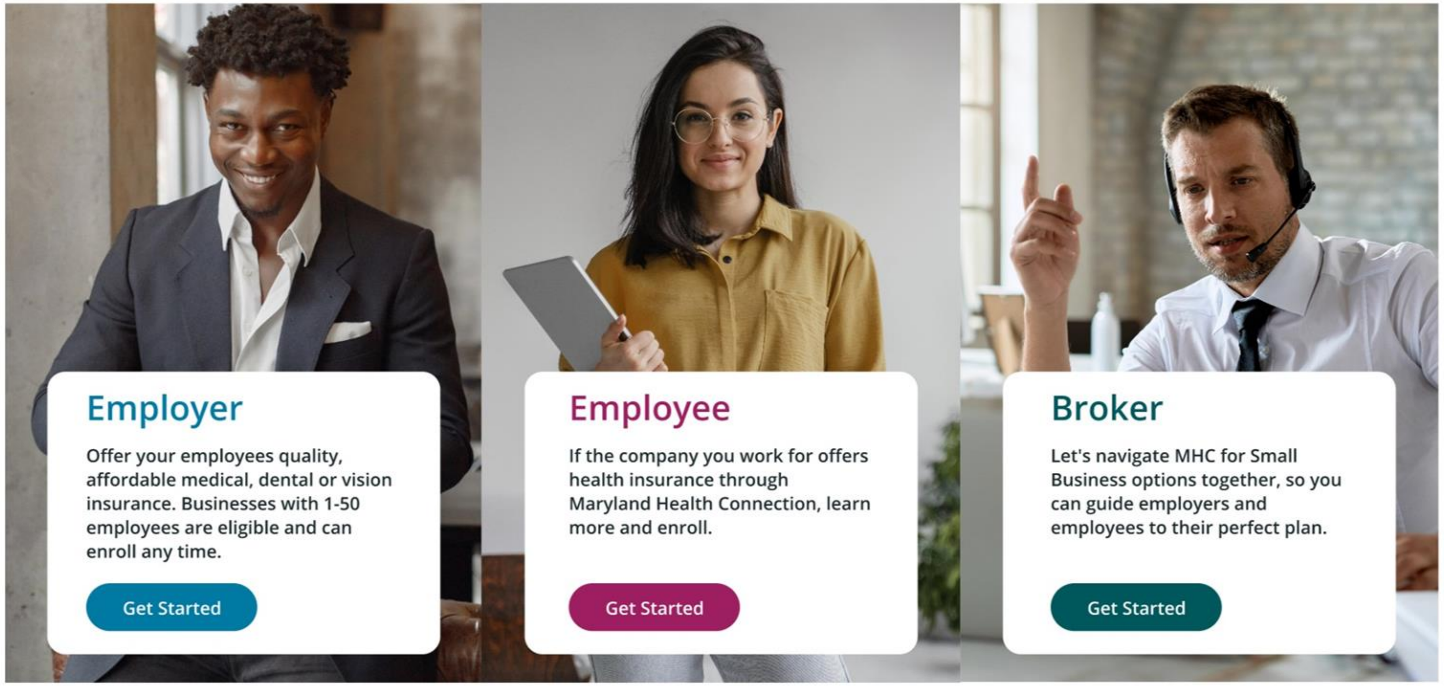
MHC for Small Business Update

Mimi Hailegeberel
Small Business Programs Manager

maryland health connection
for small business

Launch Recap

- Go-live date (Sept 1, 2025)
- Purpose: streamlined employer/employee enrollment, simplified billing, employee choice
- Key launch objectives: usability, efficiency, scalability



maryland health connection for small business

Early Adoption Metrics (First 4 Days)

🟢 **2 New Groups** (Registered)
🔵 **1 Migrated** (✔)
🟡 **2 In Progress** (⏳)

November Renewals (10)
5 Scheduled (✔)
5 Pending (⏳)

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for small business

User Experience Feedback

- Positive highlights: faster enrollment, easier navigation
- Common questions/issues reported
  - Employee roster upload
  - Broker tango process
- Support channels utilized (call center, broker portal, MHC-SB email)

Operational Performance

- Payment processing
- Carrier integration complete
- Issue escalation handling (brokers + call center)

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Next Steps

- Continued monitoring of system stability
- Planned enhancements (e.g., renewal, COBRA, additional reporting tools)
- Ongoing training + communications for employers/brokers
- Commitment to ongoing improvements

Questions?

Thank you to the 2025 Plan Management Stakeholder Committee!