

Greenleaf, Brittnee L

From: Ossenfort, Kristine <Kristine.Ossenfort@anthem.com>
Sent: Friday, August 28, 2020 4:38 PM
To: Cioppa, Eric A; Rawlings-Sekunda, Joanne; Hooper, Mary M
Cc: Greenleaf, Brittnee L
Subject: Clear Choice Plan design comments

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Superintendent Cioppa, Ms. Rawlings-Sekunda, and Ms. Hooper:

Thank you for the opportunity to offer comments with respect to the Bureau's effort to create standardized plan designs pursuant to 24-A M.R.S. §2793. As discussions continue, we may seek to expand on these comments and will undoubtedly have additional comments to share but at the present time, Anthem would like to offer the following:

General comments

1. The development of Clear Choice plan designs has the potential to create significant disruption in the market, which will likely lead to significant member abrasion. We would note that the risk of disruption and abrasion increases significantly if the individual and small group markets are merged and the Clear Choice plan design requirements are imposed at the same time. As a result, we would suggest that the Bureau start with establishing Clear Choice plan design requirements for just a few essential health benefits (EHBs) in this first year.
2. It has not yet been determined whether the individual and small group markets will merge, it will be necessary to develop three sets of Clear Choice plan designs:
 - Individual market;
 - Small group market; and
 - Merged market
3. A variety of Clear Choice plan design options should be developed for each metal level in order to maximize choice, create a number of different price options, and minimize disruption and abrasion. Carriers should be provided as much flexibility as possible in plan design in order to achieve lower price points and maintain affordability. As was noted in the call on August 12, standardized plan elements do not lead to lower costs and maintaining affordability of these products will be critically important.
4. There are significant differences in plan designs in the individual and small group markets. Since Clear Choice plan designs will apply to both the individual and small group markets, current plan designs in both markets must be taken into account as the Clear Choice products are developed. Understanding that there are resource constraints and that there are a number of different plan offerings in the market today, we would suggest that the BOI could ask each of the carriers to select three plans by metal level in both the individual and small group markets for consideration as the BOI moves to develop the Clear Choice plan designs.
5. Clear choice plan designs must be available for a variety of plan structures and networks (HMO, POS, PPO, tiered networks)
6. In order to maintain affordability, we would suggest that office visit copays apply to the office visit only, with other services within the visit subject to deductible and coinsurance.

7. The Clear Choice plan designs must allow for value added benefits such as “right to shop” incentives, wellness incentives, etc. In addition, it must be permissible to include those benefits in some plans and not others (such as small group plans but not individual plans). For example, the “right to shop” legislation intentionally excluded individual market plans from its application because of the complexities it would create for members who receive advance premium tax credits.
8. What will be the process and timing for obtaining approval of alternative plan designs? Would that occur during the normal rate/form filing process, or will it need to be obtained in advance?
9. We encourage the Bureau allow three alternate plan designs for each metal level. Again, consumer choice and affordability will be extremely important in order to minimize disruption and abrasion.
10. As previously noted, changes to the AV calculator for 2021 cause a number of plans to fall out of AV compliance. How will changes that may need to be made in order to maintain AV compliance be addressed?

Comments on questions posed by the Bureau:

11. How should pediatric dental be handled? Currently, pediatric dental is embedded in individual products sold off exchange, but not in those on exchange. We are still considering this question and may provide the Bureau with additional feedback on this issue.
12. HSA plans—we believe it is important to provide HSA plan options at the gold, silver, and bronze levels for both individual and small group purchasers.
13. Mental health parity--do carriers have any suggestions on how to implement? As the Bureau staff noted, mental health parity will be challenging to implement successfully. We would suggest that the Bureau may wish to consult with an expert early in the process in order to evaluate whether such designs can meet the requirements of mental health parity, particularly since the plan designs must pass quantitative testing for different levels of utilization. (It is our understanding that the State of Connecticut may have had to redesign its plans as carriers began testing and the plans did not pass the quantitative testing.)
14. Timing—In order to determine which plans we will offer, pair them with networks, price them, and make any required system changes to build and implement the benefit structures, the Clear Choice plan designs should ideally be finalized by the end of 2020, but no later than January 2021.

Comments on the BOI Spreadsheet (Standardized Plans 08-12-2020)

15. It is difficult to comment on the plan designs developed for other markets, as many of those states have very different landscapes in terms of health care costs and provider competition; products that offered in those states may not translate well to a state like Maine. We will continue to review and may provide additional feedback to the Bureau.

Thank you again for the opportunity to share these comments and questions. Please let me know if you have any questions, and we look forward to further discussions on September 15.

Sincerely,

Kris

Anthem, Inc.

Kristine M. Ossenfort, *Senior Government Relations Director*

2 Gannett Drive, South Portland, Maine 04106

O: (207) 822-7260 | M: (207) 232-6845

kristine.ossenfort@anthem.com

SAFE SPACE ALLY *Pronouns: She, her, hers*



CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information or may otherwise be protected by law. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message and any attachment thereto.