

Small Business Programs Advisory Committee (SBPAC)

Meeting 11: May 29, 2024



Maryland Open Meetings Act disclaimer: Meetings are recorded and posted on MHBE's website along with meeting minutes and presentation slides

Agenda

1:00 - 1:15

Welcome, Agenda, Meeting Minutes

Jon Frank, Co-chair

1:15 - 1:30

MHC for Small Business Portal Updates

Mimi Hailegeberel, Small Business Program Manager

1:30 - 1:45

MHC for Small Business Marketing Plan Update

Theresa Battaglia, Small Business Outreach Manager

1:45 - 2:00

Small Business Policy Update

Amelia Marcus, Health Policy Analyst

2:00 - 2:50

Discussion

2:50 - 3:00

Public Comment

Approve Meeting Minutes

- March meeting minutes were emailed to members on 4/11/2024.

Broker Achievement Awards



MARYLAND
HEALTH BENEFIT
EXCHANGE

2024 BROKER ACHIEVEMENT AWARDS

Monday, May 6, 2024
Live! Casino & Hotel Maryland

Marylandhbe.com

#BrokerAwardsMHBE24



[Maryland Health.mp4](https://MarylandHealth.mp4)



Enrollment Portal Updates

MHC for Small Business Vision



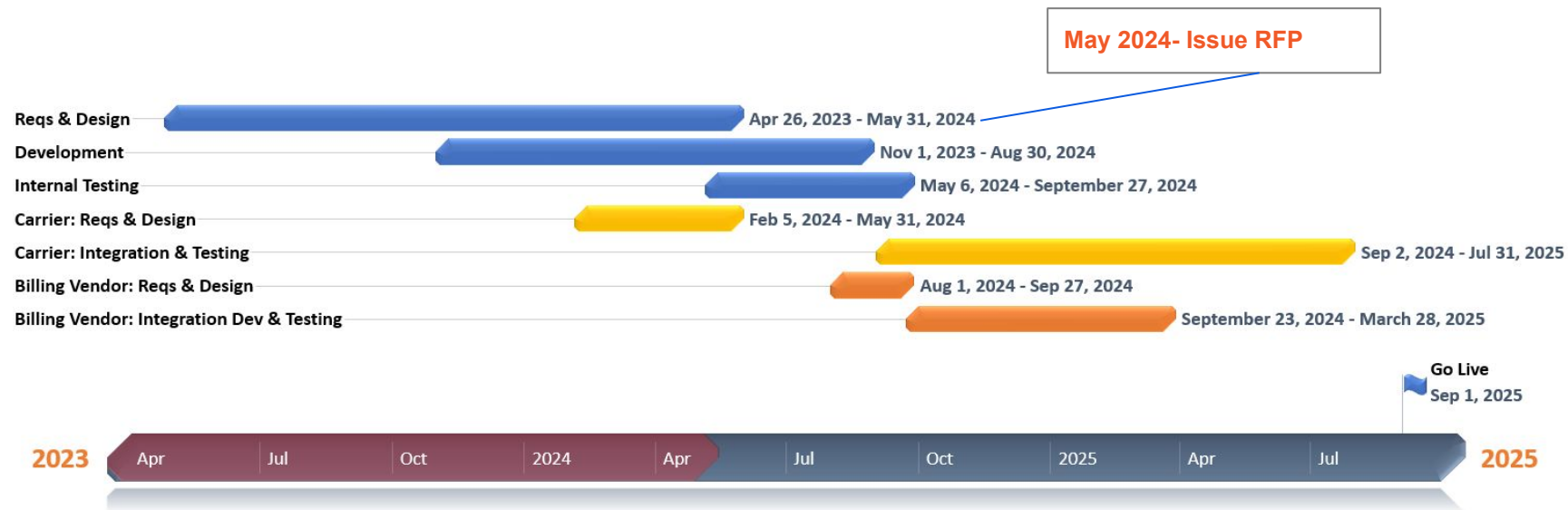
- **Mission:** Reduce the Maryland uninsured rate to less than 5.5 percent.
- **Target Audience:** Small Businesses with less than 10 employees.
- **Enrollment Goal:** Enroll approx. 10,000-15,000 in the first 5 years, post-launch.
- **Legal Obligation:** Fulfill our statutory mandate to serve small businesses (Md. Code Ann. §31–102 (c)(3)).
- **Action Plan:** Implement a robust marketing strategy pre-launch.

Carrier Integration Timeline



Updated: May 9, 2024

Enhanced Enrollment Platform Status



Updated: May 9, 2024

Plan Selection

Employer Plan Selection Options

- A Single Plan.
 - No reference plan.
- Employer Choice: All plans from one insurance company.
 - Employer chooses a reference plan.
- Employee Choice: Plans from all insurance companies.
 - Employer chooses a reference plan.

The screenshot shows the 'Choose Plan' page in the Maryland Health Connection portal for small business. The left sidebar contains navigation links: Dashboard, Employees, Inbox, Quotes, and My Profile. The main content area is titled 'Choose Plan' and has two tabs: 'Select Package' (active) and 'Choose Plan'. Below the tabs, there are three radio button options for benefit package models: 'Single Plan' (selected), 'All Plans from One Insurance Company', and 'Plans from All Insurance Companies'. Each option has a brief description. Below these, there is a section 'Select a Insurance Company' with logos for Carefirst BlueChoice, Kaiser Permanente, Aetna, and United Healthcare. Further down, there is a 'Reference Plan' section with a text box and a '+ Choose a Plan' button. At the bottom, there are 'Back', 'Cancel', and 'Next' buttons.

maryland health connection™ for small business

← Choose Plan

Select Package ☒ Choose Plan

Please choose from one of the three benefit package models

☒ Single Plan
Choose one plan from one insurance company

☐ All Plans from One Insurance Company
Choose one insurance company. Employees can choose any plan from that insurance company

☐ Plans from All Insurance Companies
Choose one or two consecutive metal levels. Employees can choose any plan from any insurance company in the selected metal levels.

Select a Insurance Company

Carefirst BlueChoice Kaiser Permanente aetna United Healthcare

Reference Plan
Select one health insurance plan as your reference plan. The reference plan determines the amount you will contribute toward employees' premiums.

+ Choose a Plan

Back Cancel Next

Minimum Participation Requirement

- Employee Enrollments section displayed until OE end date.
- Employers send OE reminders to employees via “Notify” button.
- Access Employee Management from dashboard to add or upload employees anytime before or after creating benefit package.
- Dashboard displays total Employees, Enrolled, Not Enrolled, Waived, and Total Dependents.

The screenshot displays the Maryland Health Connection dashboard for ABC Corporation. The interface includes a sidebar with navigation links: Dashboard, Employees, Inbox, Quotes, and My Profile. The main content area shows the company's contact information and a 'Welcome' message. A red box highlights the 'Employee Enrollments and Waivers' section, which indicates that 30 out of 35 employees have enrolled or waived coverage, and 05 or more are needed by 01-30-2024 to meet the minimum requirement. Below this, the 'Employee Management' section shows 35 total employees, with 30 enrolled, 02 not enrolled, 03 waived, and 40 family members enrolled. The 'Best Benefit Package' section features the Kaiser Permanente KP MD Gold 6150/50/POS/Dental plan, priced at \$760/monthly for 30 employees, with a payment deadline of 01-30-2024.

Dashboard

- Employees
- Inbox
- Quotes
- My Profile

ABC Corporation
410-999-4597
abc2024@gmail.com
456 Berry Rd, Baltimore City Md - 21210
Switch Account

Broker Information
Vilson Mody
ABC Agency
View More

Welcome
You are one click away! Tap to know your Benefit cost
[Get a Quote](#)

Employee Enrollments and Waivers [Notify](#)

30 out of 35 have enrolled or waived coverage | 05 or more needed by 01-30-2024 to meet minimum requirement

Important: You have until 01-30-2024 for your employees to sign up, or waive coverage

Employee Management [+ Add Employee](#)
Employer Choice/Plan

35 Employees | 30 Enrolled | 02 Not Enrolled | 03 Waived | 40 Family Members Enrolled

Best Benefit Package [Gold](#)

KAISER PERMANENTE
KP MD Gold 6150/50/POS/Dental
Plans By: Plans Offered by One Carrier

\$760/ Monthly
Covering 30 Employees

Offered to
• Full Time Employees
• Employee's Spouses
[View More](#)

Coverage Year
2024
Waiting Period: 90 days

Plan Type
PPO

Open Enrollment (OE) Date
Start Date 01-15-2024
End Date 01-30-2024

Payment Deadline
01-30-2024

Auto-renewal on: 08:35 PM | 01 Jan 2024

Auto-Renew ☒

[Change Package](#)

Crosswalked Plans & Auto-Renewals

- Crosswalked plans are plans that are identified as similar or comparable to an individual's existing plan.
- Currently, individuals are given the option to choose a new plan from the crosswalked options provided by the carrier.
- When the previous plan is no longer offered, MHC-SB will send a notice to the Employer's inbox that will detail the renewal package along with the crosswalked plan.

Notices

Go paperless!

Visit [Maryland Health Connection for Small Business](#) to select paperless delivery. It's a fast, easy, and secure way to view and keep your important plan documents.

Important Notice: Employee Plan Renewal

Employee Application ID: <<Application ID>>

Employer: <<Employer/Group Name>>
MHC for Small Business Employer ID# «Entry_Id»
Notice Date: «Month Date, Year»

Dear <<Employee FN MN LN Suffix>>|

Good News! <<Employer Name>> has chosen to renew the offer of health insurance coverage to employees through MHC for Small Business. Your open enrollment period begins on <<Renewal OE Start Date>>.

Your Coverage Will Automatically Renew

Since you already enrolled in employer-sponsored coverage through MHC for Small Business, your current plan, if available, will automatically be renewed. If your current plan is no longer available, you will be automatically enrolled in the most similar plan. You can choose a different plan during your open enrollment period between <<Renewal OE Start Date>> and <<Renewal O/E End Date>>. Coverage will begin on <<Coverage Start Date>>.

Decide if you want to stay in this plan or choose another one by <<Renewal O/E End Date>>.

Your New Plan and Cost Information

Your Medical Coverage	Current Plan Coverage Dates: (<<Current Plan Effective Date>> - <<Current Plan End Date>>)	New Plan Coverage Dates: (<<Renewal Plan Effective Date>> - <<Renewal Plan End Date>>)
Covered Individual(s)	<<Employee Name>> <<Dependent 1>> <<Dependent 2>> <<Dependent 3 etc>>	<<Employee Name>> <<Dependent 1>> <<Dependent 2>> <<Dependent 3 etc>>

Plan Information		
Plan	<<Current Carrier Name>> <<Current Plan Name>>	<<Renewal Carrier Name>> <<Renewal Plan Name>>
Coverage Date	Coverage ends: <<Current Coverage End Date>>	Coverage begins: <<Renewal Plan Effective Date>>
Cost Information		
Total Monthly Premium	Employee Pays: <<Employee Premium>> Employer Pays: <<Employer Premium for Employee Household>>	Employee Pays: <<Employee Premium>> Employer Pays: <<Employer Premium for Employee Household>>

You Can Change Your Plan Selection during Open Enrollment

You must make any changes to your employer-sponsored coverage through MHC for Small Business by <<renewal O/E end date>>. If you no longer want coverage through <<Employer Name>> you must go into your MHC for Small Business employee account and "waive" coverage for the upcoming plan year.

Renewals

- When the previous plan is no longer offered, MHC-SB will send a notice to the Employer's inbox that will detail the renewal package along with the crosswalked plan.
- The Employer will be prompted to choose a new plan.

Renew Plan

This plan is no longer offered. [Choose new plan](#)

This is your Benefit Package for 2023 which will expire on Dec 31 2023. [Click here to View Plan Shopping Details.](#)

KAISER PERMANENTE
KP MD Gold 6150/50/POS/Dental

★ 4.5 Quality Rating

Cost	For Employees	For Employers	Annual Deductible
\$760/ Monthly Total Cost	\$250/ Monthly	\$510/ Monthly	\$990/ Person \$990/ Group

Annual Out of Pocket Maximum: \$990 / person, \$990 / group

Primary Care Co-Pay: 40% Coinsurance

Urgent Care Center: 40% Coinsurance

H.S.A. Certified: Yes

[Important Plan Information](#) | [Plan Costs & Benefits](#) | [Prescription Drug Details](#) | [See Detailed Monthly Rate Breakdown](#) | [Find a Doctor](#)

Coverage Effective Date
01-01-2024

Open Enrollment (OE) Date
Start Date: 01-15-2024 | End Date: 01-30-2024

Waiting Period
90 days

Coverage Offering
Employer Choice/Plans Offered by One Company

Coverage Model
Plans Offered Across All Companies Plans

Contribution Amounts

KAISER PERMANENTE
KP MD Gold 6150/50/POS/Dental

Total Cost per Month	Total Employees Cost per Month	Total Employer Cost per Month
\$760	\$250	\$510

[Back](#)

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Auto-Renew (Crosswalk)

- If the group selects auto-renew and does not actively review and select a new plan, they will be crosswalked into a similar plan.

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Dashboard

Employees

Inbox

Quotes

My Profile

← Renew plan

Your plan Kaiser Permanente 1 has been replaced with a similar plan, Kaiser Permanente 2. This will be your Benefit Package for 2024. It will expire on Dec. 31, 2024.

You are saving \$400 with this New Plan!

Current Plan	New Plan
<div> <div>Kaiser Permanente</div> <div>KP MD Gold 6150/50/POS/Dental</div> <div>Total Cost</div> <div>\$760</div> </div> <div> <div>Total Employees Cost per Month</div> <div>\$250</div> </div> <div> <div>Total Employers Cost per Month</div> <div>\$510</div> </div> <div> <div>Annual Deductible</div> <div>\$9900/person \$9900/group</div> </div> <div> <div>Annual Out of Pocket</div> <div>\$9900/person \$9900/group</div> </div> <div> <div>Urgent Care Center</div> <div>40% Coinsurance</div> </div> <div> <div>Primary Care Copay</div> <div>40% Coinsurance</div> </div> <div> <div>H.S.A. Qualified</div> <div>Yes</div> </div>	<div> <div>Kaiser Permanente</div> <div>KP MD Gold 6150/50/POS/Dental</div> <div>Total Cost</div> <div>\$360</div> </div> <div> <div>Total Employees Cost per Month</div> <div>\$110</div> </div> <div> <div>Total Employers Cost per Month</div> <div>\$250</div> </div> <div> <div>Annual Deductible</div> <div>\$1320/person \$1320/group</div> </div> <div> <div>Annual Out of Pocket</div> <div>\$1320/person \$1320/group</div> </div> <div> <div>Urgent Care Center</div> <div>40% Coinsurance</div> </div> <div> <div>Primary Care Copay</div> <div>40% Coinsurance</div> </div> <div> <div>H.S.A. Qualified</div> <div>Yes</div> </div>

Plan Overview

Health Care Provider [Search](#)

Plan Level

Gold

Plan Type

PPO

Enrollee Experience

Sample data

H.S.A. Qualified

Yes

Clinical Quality & Management

Example Type

Plan Efficiency Affordability & Management

Sample data

[Details](#)

[See Detailed Monthly Rate Breakdown](#)

Plan Overview

Health Care Provider [Search](#)

Plan Level

Gold

Plan Type

PPO

Enrollee Experience

Sample data

H.S.A. Qualified

Yes

Clinical Quality & Management

Example Type

Plan Efficiency Affordability & Management

Sample data

[Details](#)

[See Detailed Monthly Rate Breakdown](#)

Back

Cancel

Next

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Marketing Update

Communication Tools to Promote Small Biz Video Content

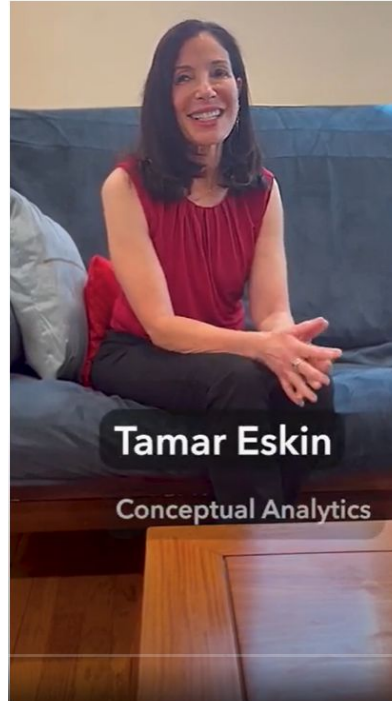
- **What is MHC for Small Business?** English and Spanish
- **Small Business tax credits**
- **How to get help** (promoting free authorized broker support)
- **Testimonial** broker and small business testimony - owner/employees



Testimonials



Pao Kao, Office Manager
Germantown Allergy & Asthma



Tamar Eskin, Owner
Conceptual Analytics



Shelly Eldridge, founder
The Confidence Coach

Social Media & Testimonials

Strategies to Target Small Businesses

Facebook, Instagram, LinkedIn & YouTube

Use social media to target small business owners



- **May is National Small Business Month** - Provide posts to support Small Businesses
 - **MHC for Small Business** celebrates National Small Business Month, not just in May, but year round! Enroll your employees in a private health plan any time of the year. Keep celebrating and thriving!
MHCSmallBiz@MarylandHealthConnection.gov
- **MHC for Small Business Video** - English & Spanish YouTube, Webinars, Presentations

Read All About It!



- Develop news stories with statewide media recognizing small business success.
- Hold regional press events to promote MHC with Small Businesses and brokers (on-site) on their success, benefits of the tax incentive program and financial incentives, and employee retention.
- Partner with statewide newspapers and radio stations (schedule interviews called Small Biz Strong MD...Small and Healthy!).



Small Business Policy Update

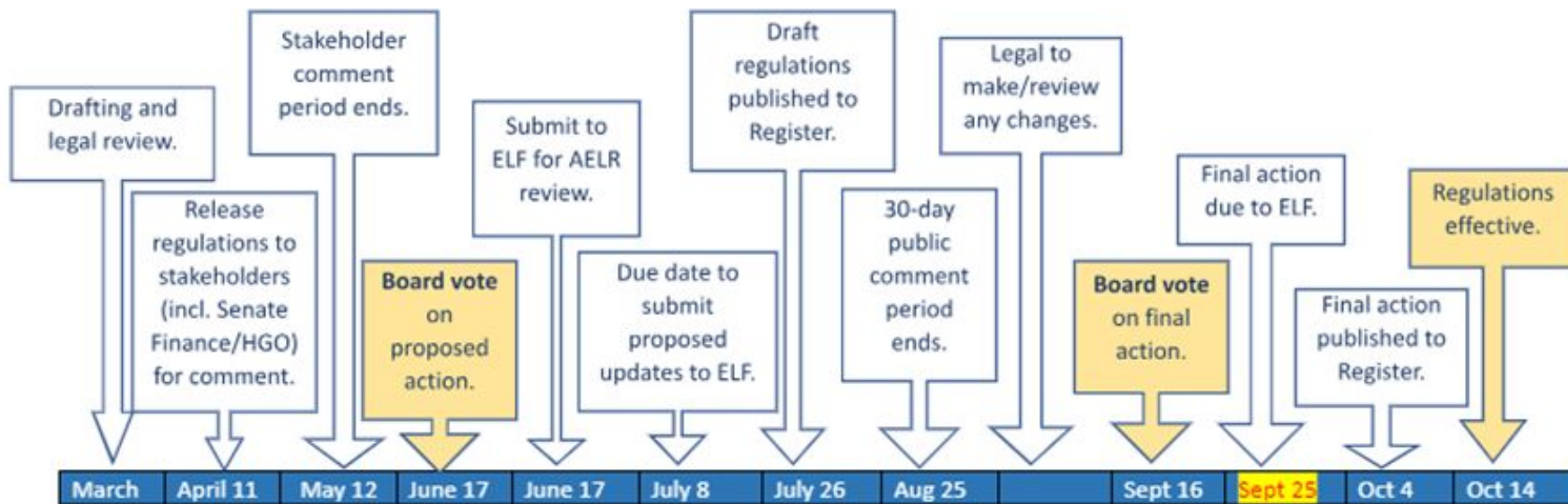
MHC-SB Policy Update

- Stakeholders review and feedback were due May 12th 2024.
- Comments from two issuers in support of the changes.

Changes to COMAR 14.35.18:

1. Change the employee minimum participation rate (MPR) for a qualified employer's SHOP eligibility to "at least 60%" uniformly.
2. Reduce the wait period a small employer may set for a qualified employee to no more than 60 days. Current regulation allows up to 90 days.

SHOP MPR and Wait Period Regulatory Updates Timeline





Discussion



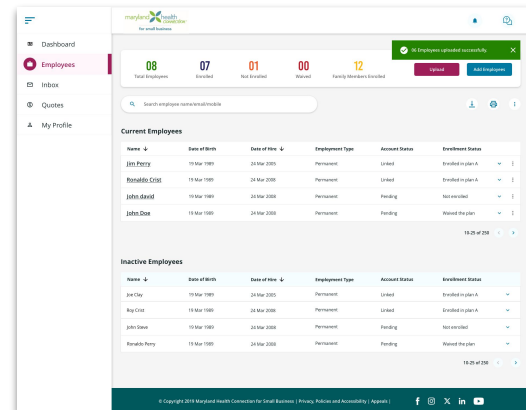
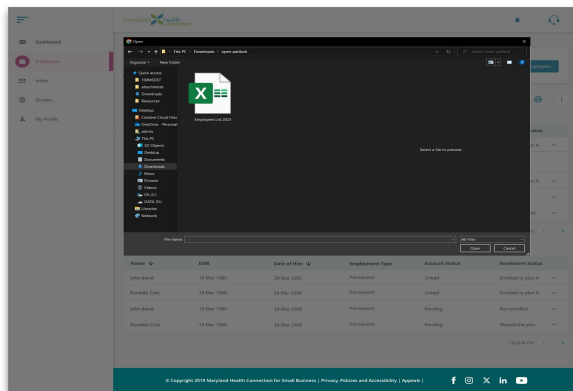
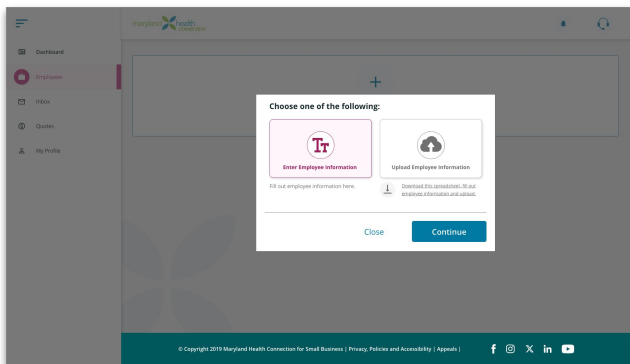
Public Comment



Appendix

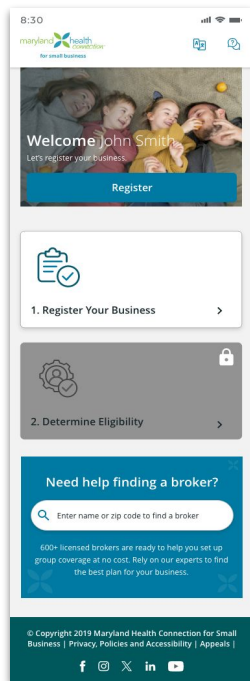
MHC-SB Portal Updates

- Supports Upload employees details



MHC-SB Portal Updates

- Supports Mobile Experience



Professional Employer Organizations (PEOs)

PEOs

PEOs are co-employers.

The PEO relationship involves a contractual allocation and sharing of employer responsibilities between the PEO and the client. This shared employment relationship is called co-employment. As co-employers, PEOs contractually assume substantial employer rights, responsibilities and risk through their employer relationships with their clients' workers.

- Provides integrated services to manage critical human resource responsibilities and employer risks;
- Establishes and maintains an employer relationship with the employees at the client's work site (share employees);
- Contractually assumes certain employer rights, responsibilities and risk.
- Different PEOs have different pricing structures, often charging per-employee per-month fees or a percentage of each payroll run.



MIA Study Bill - HB 827

- Maryland allows Professional Employer Organizations (PEOs) to operate within the state in certain capacities.
- MIA's statement:

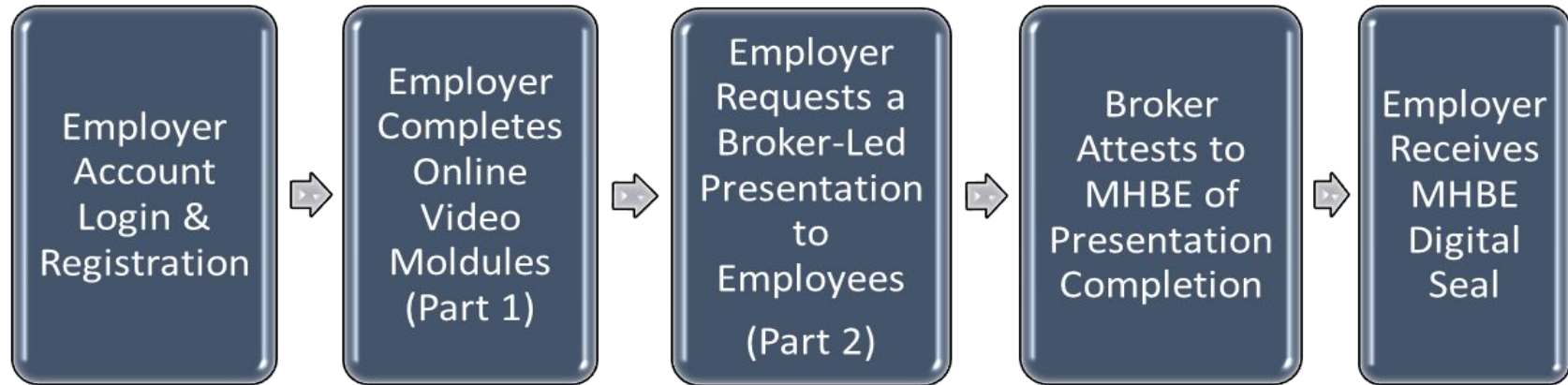
“Currently, Maryland is one of three states in the country that effectively prevent a small employer that has engaged a PEO from participating in the PEO's large group health plan. A Maryland small employer may engage a PEO to perform human resource and payroll services and may take advantage of pension and retirement plans sponsored by the PEO. However, with respect to health insurance, Maryland law looks at the number of people at the workplace employer level in determining whether the health insurance issued to those individuals must meet small group vs large group requirements.”

MIA Study Bill - HB 827 - Cont...

- If the bill passes, the Maryland Insurance Administration (MIA) will be mandated to conduct a study on professional employer organizations (PEOs) in the state, with a report due by December 31, 2024, to the House Health and Government Operations Committee and the Senate Finance Committee.
- Requirements include; (1) compare federal and state regulations on PEOs, (2) assess historical and industry changes, (3) examine PEO health plans, (4) review membership requirements for businesses in PEO arrangements, (5) analyze regulatory structures in other states for co-employed individuals in PEOs, and (6) evaluate the potential impact of proposed statutory changes on PEO health coverage in the small group market.

Outreach & Education Update

- Proposed process flow for and outreach and education program targeting employers and employees of small businesses.
- Do you recommend a different approach for the below outreach and education process flow?



Welcome New Members

Name	Organization
Amber Hyde	All About Benefits, LLC
Stephanie Klapper	Maryland Citizens' Health Initiative
Dr. Armel Simo	Petro Health, LLC

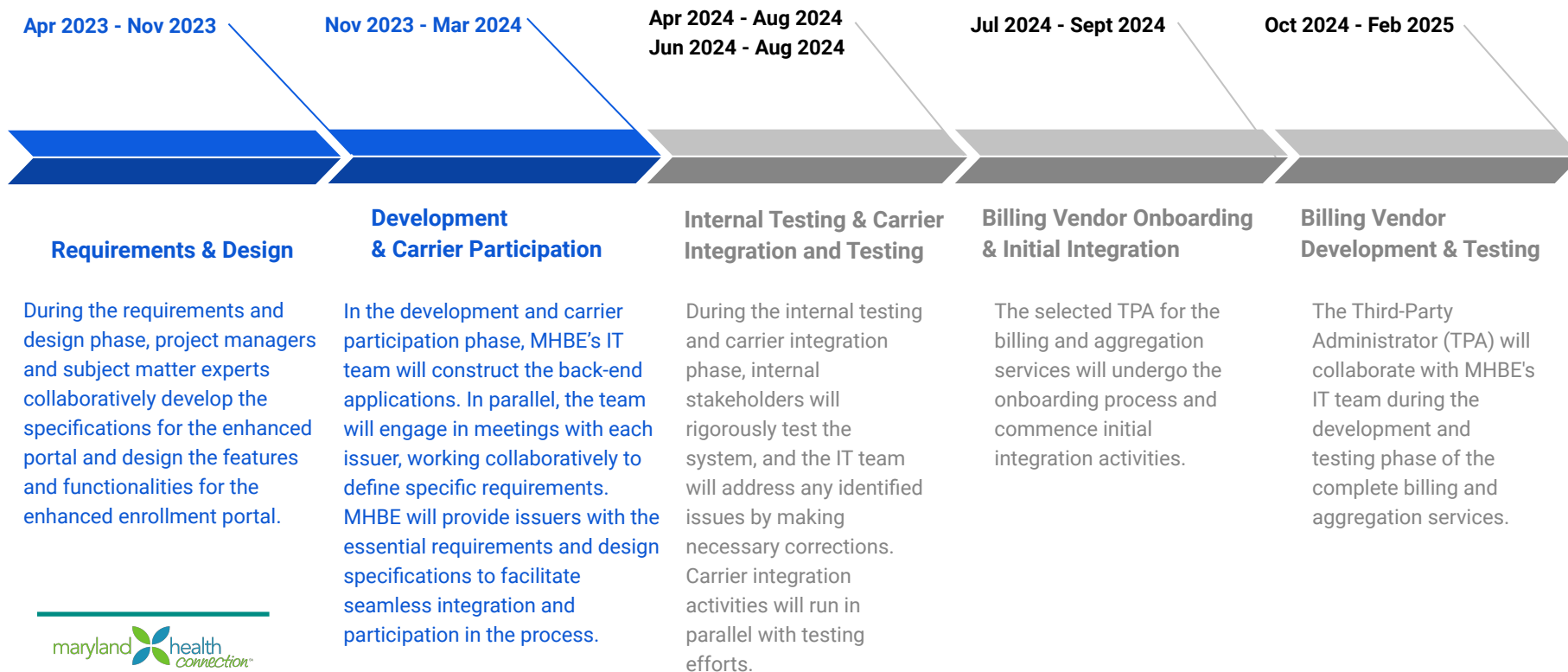
2024 Objectives

1. MHC for Small Business Enrollment Portal.
2. Small Business Policy/Regulation changes.
3. Marketing Initiatives.



Do you have any additional objectives to suggest for the upcoming year? Your input is welcomed and encouraged.

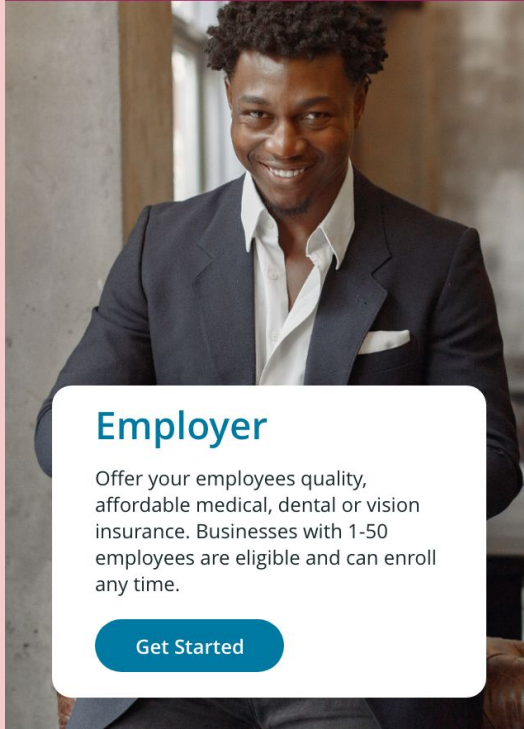
MHC-SB Enrollment Portal Status





Enhanced Enrollment Portal Design

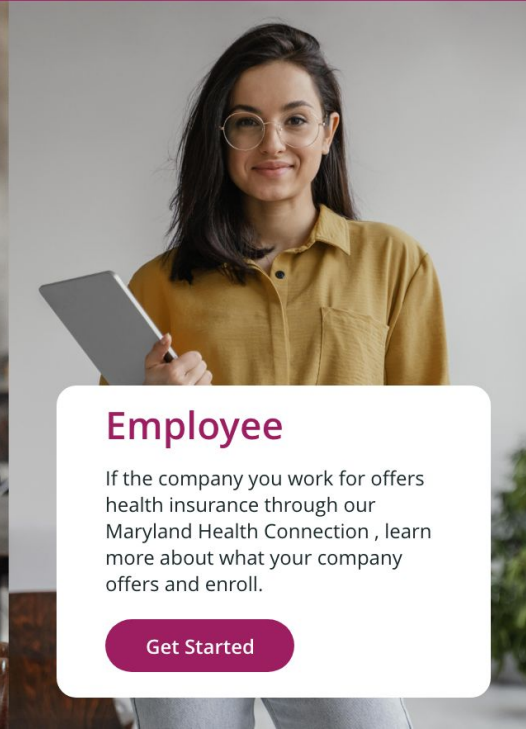
Maryland Health Connection for Small Business



Employer

Offer your employees quality, affordable medical, dental or vision insurance. Businesses with 1-50 employees are eligible and can enroll any time.

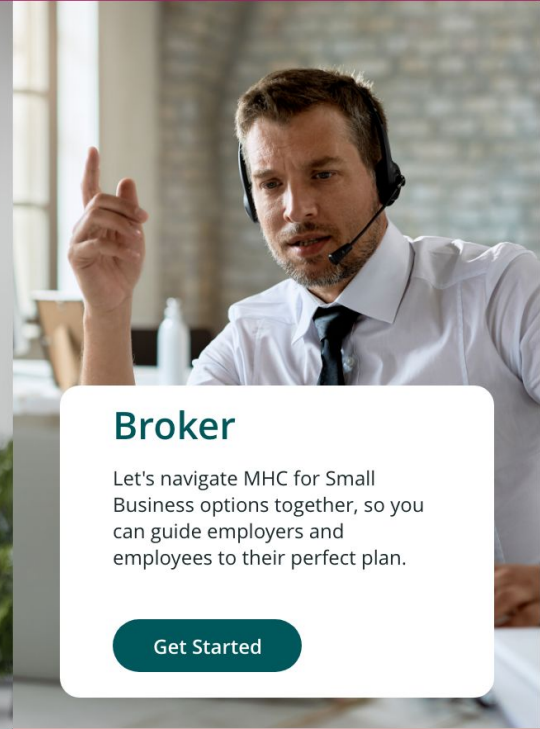
[Get Started](#)



Employee

If the company you work for offers health insurance through our Maryland Health Connection, learn more about what your company offers and enroll.

[Get Started](#)



Broker

Let's navigate MHC for Small Business options together, so you can guide employers and employees to their perfect plan.

[Get Started](#)

Self-Service Digital Portal

Contemporary Digital Self-Service Portal for Small Business Owners, Employees, and Insurance Brokers

For
Brokers

Dashboard with actionable buttons

Welcome John Doe

~we empower your small business with health insurance solutions tailored for success and well-being~

Clients 242 **New Inbox Messages** 106

Tango Requests

Name	Phone Number	Language	Client Status	Requested on	Action	Status
PMF Corp	9083847024	English	No info	22 Dec 2023	Decline	Accepted
Dub Royal	9083847024	English	No info	28 Dec 2023	Decline	Accepted
David Ibrahim	9083847024	English	No info	19 Dec 2023	Decline	Accepted
Rak Road	9083847024	English	No info	28 Dec 2023	Decline	Accepted
David Ltd	9083847024	English	No info	19 Dec 2023	Decline	Accepted

Search tool with Smart Grid capabilities

Search Client by name, EIN, Email id

Name	EIN	Email ID	Phone Number	Enrollment Status	No. Employees
MHC Corp	***-**-1624	Ali@2024@gmail.com	9083847024	Enrolled	24
WFF Corp	***-**-3489	Ali@2024@gmail.com	9083847024	Not Enrolled	18
Larkwood Health	***-**-2892	Uchi@2024@gmail.com	9083847024	Enrolled	24
Novell	***-**-4792	Nov@2024@gmail.com	9083847024	Enrolled	14
Johns Hopkins Medicine	***-**-0934	John@2024@gmail.com	9083847024	Not Enrolled	19
MCCentrix	***-**-3422	Mcc@2024@gmail.com	9083847024	Enrolled	14
OSP LLC - United America	***-**-3423	Osua@2024@gmail.com	9083847024	Not Enrolled	14

Integrated Inbox for communication

Search Client by name, EIN, Email Id

MHC 3:00PM 05 Oct 2023

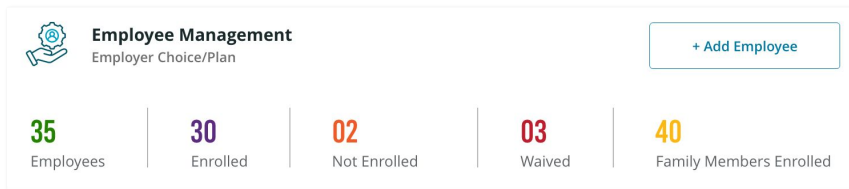
Welcome to MHC for Small Business

Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua.

Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor in reprehenderit in voluptate velit esse cillum dolore eu fugiat nulla pariatur. Excepteur sint occaecat cupidatat non proident, sunt in culpa qui officia deserunt mollit anim id est laborum.

For Small Business Owners

Dashboard



Reference Plan & Cost

Best Benefit Package

KAISER PERMANENTE
KP MD Gold 6150/50/POS/Dental
Plans By: Plans Offered by One Carrier

\$760/ Monthly
Covering 30 Employees

Gold
Offered to

- Full Time Employees
- Employee's Spouses

[View More](#)

Coverage Year	Plan Type	Open Enrollment (OE) Date	Payment Deadline
2024 Waiting Period: 90 days	PPO	Start Date 01-15-2024 End Date 01-30-2024	01-30-2024

Auto-renews on:
08:35 PM | 01 Jan 2024

Auto-Renew ☒

Change Package

Broker Information

Broker Information

Andria Smith
ABC Agency

410-999-4597
NPN : 154234546

Andriasmith66@gmail.com
456 Berry Rd, Baltimore City Md - 21210
Languages Spoken : Spanish

Remove

For Employees

Employee Dashboard

Quick Action Tools

The dashboard displays the following information:

- Welcome Cody Ben** (UHC Bronze Virtual First, Enrolled)
- Primary Care:** NA
- Urgent Care:** \$90 Copay
- Mental Health Outpatient:** 40% After deductible
- Medical:** Bronze
- Coverage Effective Date:** 01/01/2023 - 12/31/2023
- Costs:**
 - Total Monthly Cost: \$461.10
 - Employer Monthly Cost: \$230.55
 - Your Monthly Cost: \$230.55
- Quick Action Tools:**
 - COBRA/ MID State Continuation
 - Report a Change
 - Disenroll My Coverage
- Plan Details:**
 - Deductible:** \$4,000 (Individual)
 - Annual out of pocket:** \$10,000 (Family)
 - Annual out of pocket:** \$9,000 (Individual)
 - Annual out of pocket:** \$18,000 (Family)
- Find a health care provider:** Search for providers by name, specialty, and more.
- Search for a prescription drug:** Click to search prescribed drug.
- My Employer:** Hello Mark, Techno Solutions, 410-122-4567, 123 Pratt Street, Baltimore, MD 21119.
- Broker:** Robert Dibulan, AIRCD Agency, 410-999-1234, 456 Pratt Street, Baltimore, MD 21110.

Search Tools

The search tool displays the following information:

- Find a provider** (Primary Care, Specialist)
- Search Provider:** Provider Name/Group Name, Location: Baltimore, MD
- More Filters:** Provider Specialty, Distance, Provider State, Language, Provider County
- Search Results:** 2 Results found.
- Robert M Sethy:** Physician | Male, 410-999-1234, 123 Pratt Street, Baltimore, MD 21210, 1.4 Miles Away.
- Robert M Sethy:** Physician | Male, 410-999-1234, 456 Pratt Street, Baltimore, MD 21110.

MHC for Small Business Policy

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connectionSM
for small business

Crosswalked Plans & Auto-Renewals

- Crosswalked plans are plans that are identified as similar or comparable to an individual's existing plan. The term "crosswalk" suggests a connection or mapping between the old and new plans.
- Currently, individuals are given the option to choose a new plan from the crosswalked options provided by the carrier. This allows them to maintain coverage while accommodating changes in cost-sharing.
- Would you support MHBE proposing that carriers offer the same plans for a minimum of two years to minimize disruptions to small businesses and to provide stability and continuity, particularly for their most popular plans?

2024 MHC Small Group Plans

Issuers	MHC Small Biz Medical Private Health Plans
CareFirst/GHMSI	17
United Healthcare/Optimum Choice/MAMSI	23
Aetna Health CVS	6
Kaiser Permanente	13
Total	59

2024 MHC Small Group Plans

	Kaiser Permanente	CareFirst BlueChoice	GHMSI	CareFirst of MD, Inc	Aetna CVS	UHC	MAMSI	Optimum Choice
Platinum	2	0	0	0	0	1	2	2
Gold	4	3	1	1	2	4	2	2
Silver	4	4	1	1	2	4	2	1
Bronze	3	4	1	1	2	1	1	1
Total	13	11	3	3	6	10	7	6

Regulatory Update: Amendment to COMAR 14.35.15.08C

- Pre-2025: Carriers allowed four plans in each bronze, silver, gold, and platinum metal levels for MHC Individuals and Small Business.
- Post-2025: Limitation to three plans per metal level.
- Rationale: Recommended by the 2022 Affordability Workgroup to address consumer choice overload during plan shopping.
- Result: MHBE has submitted comments to the AG: Limiting SHOP market plans to three per metal level is unnecessary because “choice overload” is not a problem in the SHOP market. This change back to the status quo is in alignment with federal regulations.

COMAR 14.35.18.06: Employee Choice Model

- The proposed change in the Employee Choice Model, from allowing employers to select two consecutive metal tiers to permitting all four metal tiers for employees, has prompted consideration and received public feedback.
- In response to recommendations, we are conducting additional market analysis and stakeholder discussions to carefully assess the implications of altering COMAR 14.35.18.06 - Employee Choice Model Requirements.
- Concerns about potential increased risk selection leading to higher premiums in the small group market, potentially reducing SHOP Exchange appeal to carriers.