



FINANCE & SUSTAINABILITY ADVISORY COMMITTEE: COMMENTS & RECOMMENDATIONS

The Chair of the Maryland Women's Coalition for Health Care Reform was pleased to serve on this committee and appreciates the work of all of its members as it achieved consensus on a number of key issues. The Coalition also recognizes the complex task now faced by the Exchange Board in compiling its report to the Governor and General Assembly. In light of these factors, the Coalition has limited its comments and recommendations to a few key issues. In compiling its report in its totality, we hope that the Board will take into consideration the "A" rating Maryland's Exchange recently received in US PIRG's "Making the Grade: A Scorecard for State Health Insurance Exchanges" (October 2011). This grade, as the report noted, is a qualified one and is contingent on the very decisions the Board will be making in the next six weeks. Therefore, the Coalition urges the Board to make its decisions within the context of keeping Maryland as a national model deserving of its "A" ranking.

RECOMMENDATION 1: The Board should be provided with the flexibility necessary to respond to the outcome of decisions yet to made at the state and federal level. Two examples are:

- The design of the Federally-mandated **Essential Health Benefit Plan** and the implications that would have on any additional benefits required to be mandated by the State. In this regard, we would suggest that the Board have the authority to weigh in at an early stage with the Department of Health and Human Services and others as appropriate and that this be done with appropriate input from legislators, consumer advocates, and other stakeholders.
- The implementation of a **Basic Health Plan (BHP)** in Maryland. The Board is well aware of the issues surrounding this and its implications for the successful operations of the Exchange. Among these is the potential size and composition of the risk pool for the Exchange, which may be counter-weighted by the potential for improved portability of coverage and access to continuity of care provided for those eligible for the BHP.

RECOMMENDATION 2: In preparing its budget, the Board should first consider the costs of key elements that will ensure the success of the Exchange rather than “backing into” a budget based on available revenues.

- One example of concern to the Coalition is ensuring that sufficient funds are allocated to the Navigator program. To be successful the Exchange must gain full participation by all those who are eligible. Given the populations this represents appropriate funding must be available to support a robust and effective program.

RECOMMENDATION 3: Any assessments on insurers must be the same both inside and outside the Exchange and this should apply equally to the SHOP.

- This will build equality between the markets inside and outside the Exchange to support its short-term success and long-term viability.

RECOMMENDATION 4: The Board should ensure that the Exchange and SHOP incorporate an integrated and interoperable IT infrastructure to promote economies and efficiencies of scale while creating the required application process that is seamless for the consumer.

- The RFP for Maryland’s Health Benefit Exchange IT suggests that not only has no decision been made as to how to handle this for the small business exchange (SHOP) but that, in fact there may be a separate IT solution with its own portal and capabilities. (See the attached, “Maryland’s HBE: Recommendations on Information Technology,” for a complete discussion of the issues)

The Coalition very much appreciates the Exchange Board’s attention to these recommendations and will be happy to discuss them further. As always, the Coalition looks forward to working with all those engaged in ensuring that Maryland continues to be a leader on health care reform and on the establishment of an effective Health Benefit Exchange.

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Maryland Women's Coalition for Health Care Reform

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