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May 14, 2015

Mr. Nick Cavey
Assistant Director of Government and External Relations
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Dear Mr. Cavey:

I am writing on behalf of CareFirst of Maryland, Inc., Group Hospitalization and Medical Services, Inc., and CareFirst BlueChoice, Inc. (CareFirst), in follow up to my letter dated April 30, regarding the Maryland Insurance Administration's designation of Maryland's 2017 essential health benefit benchmark plan. After our April 30 letter was submitted, the MIA released the three options for consideration for the benchmark plan. This letter is to follow up with our views on the options presented.

We have maintained that the MIA should choose the plan that would pose the least disruption to the market, as any significant changes to the benchmark plan would result in a significant administrative burden for all carriers with no change to consumers. The two BlueChoice plans that are included in the options released by the MIA offer the same benefits that are offered in the current benchmark plan today. The only meaningful difference between these two plans is in cost sharing. The plan most closely resembling the current benchmark plan with regard to cost sharing is the BlueChoice HMO HSA/HRA \$1,500. As a result, we recommend that the MIA designate the BlueChoice HMO HSA/HRA as the benchmark plan for 2017, with our second choice being the BlueChoice HMO Referral \$30/\$40.

Sincerely,

Signature on original

Deborah R. Rivkin