



August 27, 2025

Marie Grant
Insurance Commissioner
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Dear Commissioner Grant:

On behalf of the Maryland Hospital Association (MHA) and its member hospitals and health systems, I am writing to follow up on our July 27, 2025 [comment letter](#) on the premium rate requests for individual and small group market plans for Plan Year 2026 that were filed with the Maryland Insurance Administration (MIA).

At its Aug. 18 meeting, the Maryland Health Benefit Exchange's (MHBE) Board of Trustees finalized the design of a state-based subsidy program for Plan Year 2026 that would partially replace the federal Enhanced Premium Tax Credits (EPTCs) set to expire at the end of the year. MHA supports the effort to identify a near-term policy solution to mitigate enrollment losses and stabilize the market in the upcoming year. These subsidies will also help protect against increases in uncompensated care statewide due to the avoided potential reductions in enrollment in marketplace plans.

Given that the anticipated loss of enhanced federal subsidies was the main driver of the proposed rate increases, we respectfully ask that MIA carefully review carriers' rate filings to ensure their justifications, analyses, and assumptions—in particular, those related to changes in morbidity—account for the availability of these state-based subsidies, which should lessen the need for rate increases at the levels initially filed with MIA in June.

Thank you for all you do to ensure health care is affordable to all Marylanders.

Sincerely,

Patrick Carlson
Vice President, Care Transformation & Finance