

Comments:

- The primary change in this proposal appears to be requiring CareFirst/insurers to record the name/address information of our producers as it appears on their MD license.
- CareFirst currently maintains records for all of our producers that meets the requirements of the existing regulation. However, we keep record of the name and address according to what they provide on their contract. The address provided on the contract could differ for many reasons including simple change of residence, and as our contracts are updated annually the information they provide in the contract should be the most 'current' information.
 - If this regulation were to pass, then two situations may play out which could implicate additional costs and effort:
 1. CareFirst would need to update their systems (costly \$\$\$) to store two addresses, in the case where a license does not match the address provided on the contract;
 2. CareFirst may be placed in a situation where it would need to 'refuse' contracts from producers whose address has changed from that on the license and explain to them that they must go to the MIA, request a change of address and have a new license issued.
- Additionally, the proposed regulation suggests we record the full middle name – but the existing regulation only requires middle initial. We would prefer to keep the middle initial only in any version of this regulation. This is preferable for our current system requirements.
- Another observation is that the MIA presumably keeps a record of the address as it appears on the license – giving us question as to why that would need to be stored by CareFirst if it is not as relevant as the address they provide on their contract

As always, we appreciate the MIA's transparency and consideration!

Best,
Cathy

Cathy Grason, J.D.
Director-Government Affairs, Maryland
CareFirst BlueCross BlueShield