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January 24, 2024

The Honorable Pamela G. Beidle
Chair, Senate Finance Committee
Senate Office Building, 3 East
11 Bladen St.
Annapolis, MD 21401

Re: Letter of Support – SB 228 – Maryland Health Benefit Exchange – Qualified Health Plans – Dental Coverage

Dear Chair Beidle and Members of the Senate Finance Committee,

The Maryland Health Benefit Exchange (MHBE) respectfully submits this letter of support on Senate Bill (SB) 228 - Maryland Health Benefit Exchange – Qualified Health Plans – Dental Coverage. SB 228 would require that all qualified health plans (QHPs) cover pediatric dental benefits, in order to be certified and sold on the Exchange.

Under the Affordable Care Act (ACA), pediatric dental is one of ten essential health benefits (EHBs) that are required in all ACA-compliant individual and small group plans. However, pediatric dental differs from the other EHBs in that QHPs may exclude the benefit if pediatric dental coverage is available through supplementary stand-alone qualified dental plans (QDPs) sold through the Exchange. This bill repeals provisions that allow QHPs in Maryland to exclude pediatric dental from QHP coverage.

It should be noted that no carrier currently offers a QHP in Maryland that excludes pediatric dental. This bill will simply codify the status quo, and affirmatively require pediatric dental be included as a covered service under all QHPs. If a plan were to exclude pediatric dental, which is currently permitted subject to the flexibility explained above, it would require MHBE to implement a suite of system changes including but not limited to: updating our internal systems to identify information on which plans do not include pediatric dental, updates to the way we calculate advance premium tax credit (APTC) in order to account for plans that do not include pediatric dental, and changes to our plan display to alert consumers on which plans exclude pediatric dental – all of which would result in IT costs to the agency. In addition to system implementation challenges that would be triggered if a QHP were to choose to exclude pediatric dental, MHBE would also be concerned about consumer confusion that could result from an inconsistency in QHP pediatric dental coverage, potentially resulting in consumers inadvertently enrolling in a plan that lacks a benefit that has been determined to be essential.

For further discussions or questions on SB 228, please contact Johanna Fabian-Marks, Director of Policy and Plan Management at johanna.fabian-marks@maryland.gov.

Sincerely,

A handwritten signature in black ink that reads "Michele Eberle". The signature is written in a cursive style with a large initial "M" and a long horizontal stroke at the end.

Michele Eberle
Executive Director