



Maryland
Hospital Association

May 15, 2026

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, we appreciate the opportunity to comment on UnitedHealthcare's request for a mid-year increase in premium rates for small group market plans within the following four entities: UnitedHealthcare Insurance Company, MAMSI Life and Health Insurance Company, Optimum Choice Inc., and UnitedHealthcare of the Mid-Atlantic Inc.

The requested changes would result in an average year-over-year rate increase of 17.6% for these plans, impacting approximately 13% of all Marylanders enrolled in small group market plans—over 26,000 people.¹ MHA recognizes rates may need to be adjusted to account for costs not fully captured in the annual rate filing. However, an increase of this magnitude threatens health care affordability for small businesses and their employees.

Significant premium increases risk pricing individuals and families out of coverage, particularly at a time when Marylanders are already facing higher costs for other necessities like housing and food. Access to affordable coverage is essential. When coverage becomes less affordable, individuals and families may delay preventive care or skip needed follow-up appointments. These delays can lead to more serious health needs.

We encourage the Maryland Insurance Administration (MIA) to carefully review UnitedHealthcare's rationale and analyses to determine if the proposed adjustment is reasonable and if a mid-year change is necessary. We respectfully urge careful scrutiny of this rate request to ensure the proposed rates are not excessive in relation to benefits, inadequate, or unfairly discriminatory.

Under this standard, maintaining plan affordability must be a foundational consideration. In support of this aim, we ask MIA to evaluate adherence to medical loss ratio standards, administrative cost benchmarks, benefit design, and whether UnitedHealthcare has taken all measures available to manage increased costs without passing the burden on to Marylanders through higher premiums. Finally, we respectfully urge MIA to validate that the request and

¹ Based on MIA [estimate](#) of 2025 enrollment in small group market plans.

observed pricing trends cited in the supporting materials are principally based on Maryland-specific experience and in the small group market, to the extent possible.

Thank you for the opportunity to comment on this important matter. We look forward to continuing to work with MIA to make health care accessible and affordable for all Marylanders.

Sincerely,



Patrick D. Carlson
Vice President, Care Transformation & Finance

cc: Bradley Boban, Chief Actuary, Maryland Insurance Administration