Maryland
Hospital Association

July 16, 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 the 2027 premium rate requests for individual and small group market plans filed with the Maryland Insurance Administration (MIA).

Carriers in the individual and small group markets are requesting overall average rate increases of 13.7% and 13.1%, respectively. Double-digit premium increases threaten the affordability of health coverage for Maryland families and small businesses. They also could compound expected Medicaid coverage losses due to H.R.1, increase the number of uninsured individuals, and shift additional uncompensated care costs onto hospitals and the health care system. MHA asks MIA to carefully evaluate the proposed increases and carrier justifications, analyses, and assumptions to ensure they are not excessive or unfairly discriminatory.

Any forthcoming changes to the state's reinsurance and subsidy programs supported by the Health Services Cost Review Commission's (HSCRC) proposed $100 million allocation to the Maryland Health Benefit Exchange (MHBE) Fund—and the expected impacts of those changes on enrollment and premiums—should also be considered as part of the rate review process. Support for the reinsurance program and an increase in the level of subsidies, in particular, will mitigate the need for carriers in the individual market to increase rates at the requested levels. Carriers should revise their requests to account for any such changes.

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

Sincerely,

Patrick D. Carlson

Patrick D. Carlson
Vice President, Care Transformation & Finance

cc: Bradley Boban, Chief Actuary, Maryland Insruance Administration