



October 3, 2025

Michele Eberle
Executive Director
Maryland Health Benefit Exchange
750 East Pratt St., 6th floor
Baltimore, MD 21202

Re: Maryland Access to Care Act Implementation Delay

Dear Director Eberle:

Thank you for the opportunity to provide feedback on Maryland's Access to Care Act Implementation Delay.

The undersigned organizations represent millions of individuals facing serious, acute and chronic health conditions. We have a unique perspective on what individuals and families need to prevent disease, cure illness and manage chronic health conditions. The diversity of our organizations and the populations we serve enable us to draw upon a wealth of knowledge and expertise that is an invaluable resource regarding any decisions affecting the Affordable Care Act, the marketplace, and the people that they serve. We urge the state to make the best use of the recommendations, knowledge and experience our organizations offer here.

Our organizations are committed to ensuring that Maryland's healthcare programs provide quality and affordable healthcare coverage. Our organizations believe that allowing all Marylanders, regardless of immigration status, to enroll in marketplace coverage will advance these objectives and many of our organizations previously supported the Access to Care Act 1332 waiver.¹ However, we understand that H.R.1 and the Marketplace Program Integrity rule impose unexpected burdens on the Maryland Health Benefit Exchange and those who rely on it. Implementation of these policies will require additional costs and operational changes that require immediate and ongoing action from state-based marketplaces.

Our organizations appreciate Maryland's commitment to implementing the Access to Care Act 1332 Waiver as soon as possible and urge the state to consider earlier implementation if time and resources allow. This will enable more families with mixed immigration status to enroll in coverage together, and

for uninsured individuals with no other options for health coverage to enroll in coverage as well. As changes from H.R.1 and the Marketplace Integrity rule place greater limits on eligibility for certain immigrant populations, this waiver amendment provides an important coverage option for a growing number of Marylanders.

Thank you for the opportunity to provide comments.

Sincerely,

American Cancer Society Cancer Action Network
American Lung Association
Asthma and Allergy Foundation of America
Blood Cancer United
Coalition for Hemophilia B
National Bleeding Disorders Foundation
Pulmonary Hypertension Association
Susan G. Komen
The AIDS Institute

¹ PPC Comments re Maryland 1332 Waiver Amendment Request. September 20, 2024. Available at:
<https://www.protectcoverage.org/siteFiles/47986/09%2020%202024%20PPC%20Comments%20re%20MD%201332%20Waiver%20Amendment%20Request.pdf>