



March 5, 2012

The Honorable Thomas M. Middleton
Finance Committee
Miller Senate Building, 3 East
Annapolis, MD 21401

RE: SB 238 - Maryland Health Benefit Exchange Act of 2012 - **Oppose as Written**

Dear Senator Middleton:

The Carroll County Chamber of Commerce understands the vital importance of this legislation, and as such, we cannot offer our full support until we feel the needs of the business community are appropriately addressed within this legislation. The two biggest concerns that we have regarding this are the qualifications and structure of the navigator programs, and the lack of clarification as to how the Exchange is going to be a self-sustaining entity in the future.

With regards to the Navigators, we are quite concerned that the State feels it appropriate to have individuals giving advice and selling health insurance plans without requiring a health insurance producer's license. While we understand that Federal Legislation requires Navigators, we would be much more comfortable knowing that a Navigator requires the same training and certification as any other individual selling health insurance in the State of Maryland.

The argument that Navigators will only be "selling" a few specific products through the Exchange is not adequate in our eyes, as we would prefer to work with agents and brokers that can educate us and our employees about options both within and outside of the Exchange. We are concerned that employers and employees will not be able to make the distinction between a Navigator and an agent/broker, and will think them interchangeable.

We are concerned as to how the Exchange is going to generate revenue to pay for both the Navigators and the other expenses it generates. Charging carriers to participate will mean higher premiums, and charging businesses and individuals will mean higher taxes. Until these and other issues are more clearly addressed and defined, we ask that you give SB 238 an unfavorable report.

Sincerely,

A handwritten signature in black ink that reads 'Michael McMullin'.

Michael McMullin
President
Carroll County Chamber of Commerce

cc: Senator Joseph M. Getty
Delegate Susan W. Krebs