

September 25, 2025

The Honorable Bill Ferguson
President of the Senate
H-107, State House
100 State Circle
Annapolis, MD 21401

The Honorable Adrienne A. Jones
Speaker of the House of Delegates
H-101, State House
100 State Circle
Annapolis, MD 21401

Re: SB 791/Ch. 848(3), 2024 and HB 932/Ch. 847(3), 2024 (MSAR # 15341), Health Insurance – Utilization Review – Revisions – Prior Authorization Report

Dear President Ferguson and Speaker Jones:

Chapters 848/847 (SB791/HB932), *Health Insurance – Utilization Review – Revisions (2024)*, require the Maryland Health Care Commission (MHCC), in consultation with the Maryland Insurance Administration, to monitor progress toward implementing the online prior authorization process. This includes reviewing federal and State developments, as well as issues or recommendations from other states implementing a real-time benefit requirement, such as establishing a link at the point of prescribing for any available coupons. By December 1, 2025, MHCC must report to the General Assembly on its findings and recommendations related to the implementation of the online process. This report is submitted in fulfillment of that requirement.

The report outlines key policy developments since the legislation’s enactment, highlighting national and state-level efforts to enhance transparency, reduce response times, improve interoperability, and lower the volume of prior authorization requests. It also examines the use of real-time benefit tools, the availability of prescription drug coupons, and trends in adverse decisions within Maryland. The report contains three recommendations centered on reporting, technology, and ongoing monitoring of the prior authorization process.

We appreciate your consideration. If you have any questions or if we may provide you with any further information, please do not hesitate to contact me at douglas.jacobs@maryland.gov or 410-764-3566 or Ms. Tracey DeShields, Director of Policy Development and External Affairs, at tracey.deshields2@maryland.gov or 410-764-3588.

Sincerely,



Douglas Jacobs, MD, MPH
Executive Director, MHCC

cc:

The Honorable Wes Moore, Governor

The Honorable Pamela Beidle, Chair, Senate Finance

The Honorable Joseline A. Pena-Melnyk, Chair, House Health and Government Operations Committee

The Honorable Marie Grant, Commissioner, Maryland Insurance Administration

The Honorable Meena Seshamani, Secretary, Maryland Department of Health

Jonny Dorsey, Deputy Chief of Staff, Governor's Office (on behalf of Governor Moore)

Hannah Dier, Deputy Legislative Office, Governor's Legislative Office

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Erin Hopwood, Committee Counsel, House Health and Government Operations,

Lisa Simpson, Committee Counsel, House Health and Government Operations,

Amber Gundlach, Committee Counsel, Senate Finance

Nathan McCurdy, Committee Counsel, Senate Finance

David Sharp, Director, Center for Health Information Technology and Innovative Care Delivery, MHCC

Nikki Majewski, Chief, Health Information Technology, MHCC

Jamie Sexton, Associate Commissioner, External Affairs and Policy Initiatives, Maryland Insurance
Administration

Sarah Cason-Herron, Director, Governmental Affairs, Maryland Department of Health

Tracey DeShields, Director of Policy Development and External Affairs, MHCC

