



February 14, 2023

The Honorable Joselyn A. Pena-Melnyk
Chair, House Government & Operations
Committee
House Office Building, Room 241
11 Bladen St.
Annapolis, MD 21401

The Honorable Melony G. Griffith
Chair, Senate Finance Committee
Miller Senate Office Building, 3 East Wing
11 Bladen St.
Annapolis, MD 21401

Dear Madam Chair Pena-Melnyk and Madam Chair Griffith:

On behalf of Chesapeake Regional Information System for our Patients (CRISP), the designated health information exchange (HIE) and health data utility (HDU) for Maryland, I am writing to express our strong support for HB305 / SB308 pertaining to *Health Insurance – Utilization Review and Prior Authorization Reform*. We at CRISP believe this legislation is essential to addressing shortfalls in the current prior authorization process for many reasons, the most critical being to improve the timely delivery of care and health outcomes for Maryland's patients.

According to the Centers for Medicare and Medicaid Services (CMS), the administrative burden, delays in care, and other issues associated with inefficient prior authorization processes and framework are widespread. In response, CMS released the updated Advancing Interoperability and Improving Prior Authorization Processes Proposed Rule (CMS-0057-P) in December 2022 which seeks to address these issues and further promote efficient health data exchange between payers, providers, and patients. We acknowledge the compatibility between this Rule and the provisions outlined in HB 305 and are confident that should this legislation pass, Maryland will be well-positioned to not only achieve our desired outcomes, but do so in a way that aligns with federal healthcare and interoperability priorities.

CRISP particularly supports the provisions outlined in §15-10B-16 (2) (1) of the draft legislation which call for (i) revising electronic processes to achieve greater standardization among payors and reduce the burden of prior authorization, (ii) replacing proprietary health plan portals with a standardized solution that can enable single sign-on for payors and third-party administrators, and (iii) establishing a pilot program to implement and support these activities. The pilot study language further aligns with MHCC 2011 report to the General Assembly (*Recommendations for Implementing Electronic Prior Authorizations*) which proposed a single sign-on solution and leveraging the State's HIE as a single point of entry.

CRISP has long supported local, state, and regional healthcare priorities with technology solutions adopted through cooperation and collaboration, and we would be very pleased to partner with the Maryland Health Care Commission (MHCC), providers, payors, and other stakeholders to advance prior authorization reform in Maryland. Thank you once again for your consideration and the opportunity to express our strong support for HB305 / SB308.

Sincerely,

Craig Behm
President & CEO
CRISP