



Wes Moore, Governor · Aruna Miller, Lt. Governor · Ryan Moran, DrPH, MHSA, Acting Secretary

March 13, 2025

The Honorable Joseline A. Peña-Melnyk
Chair, Health and Government Operations Committee
241 Taylor House Office Building
Annapolis, MD 21401-1991

RE: HB 1538 – Maryland Medical Assistance Program – Maternal Health Monitoring Pilot Program - Letter of Information

Dear Chair Peña-Melnyk and Committee Members:

The Maryland Department of Health (the Department) respectfully submits this letter of information for House Bill (HB) HB 1538 – Maryland Medical Assistance Program – Maternal Health Monitoring Pilot Program.

HB 1538 would establish a Maternal Health Monitoring Pilot Program to support pregnant and postpartum Medicaid participants who have high risk pregnancies due to complications from hypertension or diabetes in FY26 and FY27. The Department would be required to select a single managed care organization (MCO) to take part in the pilot. The MCO would be required to engage a vendor to provide remote patient monitoring services (including devices) and health coaching during pregnancy and up to three months postpartum. HB 1538 would also require that the Department apply for a §1115(a) demonstration waiver to the Centers for Medicare and Medicaid Services (CMS) to implement this pilot. The Department would be required to submit a report to the Governor and General Assembly by October 1, 2027 on the outcomes of the pilot.

The bill provides for a budget of \$600,000 for the pilot, and a maximum per person cost of \$2,000. The Department notes that additional funding will also be required in FY28 to support the required study estimated at \$86,000 TF (\$43,000 GF, \$43,000 FF).

The Department notes that it is unclear whether CMS would approve the proposed demonstration and seeking such a demonstration may put the existing §1115(a) demonstration at risk. While §1115(a) demonstrations often authorize pilot programs subject to enrollment caps, limiting eligibility to the enrollees of a single plan may not be approved. Additionally, it is unclear whether CMS would deem the proposed pilot sufficiently innovative to approve as an §1115(a) demonstration.

The Department already covers remote patient monitoring for any participant who qualifies based on medical necessity and is capable of using the equipment, irrespective of diagnosis. The Department reimburses providers at a rate of \$125 per member per month to cover equipment

installation in the patient's home, patient education on how to use the device, and ongoing monitoring of the data collected. Additionally, as part of a multi-state Secretary's Postpartum Maternal Health Collaborative, Maryland established a project to address pregnant and postpartum individuals with hypertensive conditions by ensuring that all nine of Medicaid's MCOs provide remote blood pressure monitoring to this population. Blood pressure monitoring devices are provided as part of the durable medical equipment benefit.

Finally, in light of the federal administration change, the Department also notes that opening Maryland's §1115(a) demonstration waiver to include additional services prior to the expiration of the current demonstration period may put existing programs at risk. The current demonstration expires on December 31, 2026. The Department is seeking renewal for this demonstration effective January 1, 2027 and anticipates releasing that renewal for public comment later in 2025.

The Department also notes that the data available in October 2027 may not be sufficient to evaluate the proposed pilot. Providers have six to twelve months to bill Medicaid; therefore, a study performed in October 2027 is unlikely to have complete information. Additional time would be needed to complete a comprehensive evaluation.

If you would like to discuss this further, please do not hesitate to contact Sarah Case-Herron, Director of Governmental Affairs at sarah.case-herron@maryland.gov.

Sincerely,

A handwritten signature in blue ink that reads "Ryan B. Moran". The signature is fluid and cursive, with a horizontal line underneath the name.

Ryan B. Moran, Dr.P.H., M.H.S.A.
Acting Secretary