



Mid-Atlantic Permanente Medical Group, P.C.
Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc
2101 East Jefferson Street
Rockville, Maryland 20852

March 16, 2020

The Honorable Shane E. Pendergrass
Health and Government Operations Committee
House Office Building Room 240
6 Bladen Street
Annapolis, Maryland 21401

RE: SB 99 – Oppose

Dear Chair Pendergrass and Members of the Committee:

Kaiser Permanente respectfully opposes SB 99, Health Insurance Benefit Cards, Prescription Benefit Cards, and Other Technology - Identification of Regulatory Agency.

Kaiser Permanente is the largest private integrated health care delivery system in the United States, delivering health care to over 12 million members in eight states and the District of Columbia.¹ Kaiser Permanente of the Mid-Atlantic States, which operates in Maryland, provides and coordinates complete health care services for approximately 755,000 members. In Maryland, we deliver care to over 430,000 members.

SB 99 requires carriers, as well as Medicaid managed care organizations (MCOs), to print on a health insurance benefit card or prescription benefit card the abbreviation of the name of the State agency – the Maryland Insurance Administration or the Maryland Department of Health – that regulates the policy or contract. A carrier or MCO is not precluded from including any other information on a card.

While SB 99 is intended to help pharmacies identify the regulatory agency that administers a patient's health benefit plan, it also creates an opportunity for discrimination at the point of service. By clearly identifying that the individual has health insurance administered by the Maryland Department of Health, the provider or pharmacy is made aware that the card holder is a member of a HealthChoice MCO. Due to differences in reimbursement rates for selected prescription drugs, a pharmacy may, for example, use this information as an opportunity to deny filling a member's prescription. Given existing health disparities that Medicaid recipients face, we respectfully urge the Committee to reject any opportunity for further discrimination.

¹ Kaiser Permanente comprises Kaiser Foundation Health Plan, Inc., the nation's largest not-for-profit health plan, and its health plan subsidiaries outside California and Hawaii; the not-for-profit Kaiser Foundation Hospitals, which operates 39 hospitals and over 650 other clinical facilities; and the Permanente Medical Groups, self-governed physician group practices that exclusively contract with Kaiser Foundation Health Plan and its health plan subsidiaries to meet the health needs of Kaiser Permanente's members.

Kaiser Permanente
Comments on Senate Bill 99
March 16, 2020

Thank you for the opportunity to comment. Please feel free to contact Wayne Wilson at Wayne.D.Wilson@kp.org or (301) 816-5991 with questions.

Sincerely,

Wayne D. Wilson
Vice President, Government Programs and External Relations
Kaiser Foundation Health Plan of Mid-Atlantic States, Inc.