
BILL NO: Senate Bill 543
TITLE: Insurance – Health Care Sharing Ministries – Exemption
COMMITTEE: Finance
HEARING DATE: February 17, 2021
POSITION: **OPPOSE**

The Women's Law Center of Maryland (WLC) is a statewide nonprofit law firm that seeks to ensure the safety, economic security, and autonomy of women. Our mission is advanced through advocacy and also through direct legal representation of survivors of domestic violence. We write today in opposition to Senate Bill 543 and urge an unfavorable report.

The bill exempts a health care sharing ministry (HCSM) from state insurance requirements if the health care sharing ministry meets exemption requirements under federal law. This means that the HCSM would be exempt from any requirements regarding registration, documentation, or administrative oversight. While the intent of SB 543 may be to streamline an administrative processes, we have concerns about unintended negative consequence, particularly against women, if the Maryland Insurance Administration's (MIA) oversight of health care sharing ministries is removed.

If meeting federal exemption requirements, health care sharing ministries do not have to provide federally mandated coverage, including contraception coverage. Consumers may not be aware of the limitations of coverage provided through health care sharing ministries if the product is marketed similarly to insurance coverage. Therefore, we think it is important for the MIA to continue to have oversight. Through a registration process, the MIA can protect consumers by ensuring health care sharing ministries meet federal exemption requirements.

For these reasons, the WLC urges an unfavorable report.

The Women's Law Center operates two legal hotlines, and three direct legal services projects: the Protection Order Advocacy and Representation Projects in Baltimore City, Baltimore County and Carroll County, the Collateral Legal Assistance for Survivors Project, and the Multi-Ethnic Domestic Violence Project.