



Maryland Occupational Therapy Association

PO Box 36401 ♦ Towson, Maryland 21286 ♦ motamembers.org

Committee: Senate Finance Committee

Bill Number: Senate Bill 543 – Insurance – Health Care Sharing Ministries

Hearing Date: February 17, 2021

Position: Oppose

The Maryland Occupational Therapy Association (MOTA) opposes *Senate Bill 543 – Health Care Sharing Ministries*. The bill would exempt health care sharing ministries from State insurance law. We have two implementation concerns about the legislation:

- **Consumer Protection:** Current state law protects Maryland consumers by requiring the registration of health care sharing ministries. Health care sharing ministries may be exempt from federal and state insurance laws if they meet federal exemption requirements. Through the registration process, the Maryland Insurance Administration can ensure that health care sharing ministries meet those exemption requirements. However, the bill eliminates the State registration requirement, and thereby reduces the opportunity for the Maryland Insurance Administration to provide oversight; and
- **Reduces Opportunity for Needed Coverage:** We are concerned that consumers may not be aware that they cannot obtain needed coverage through health care sharing ministries, as the products may appear to be “health insurance” to the average consumer. Thus, consumers may be surprised if denied coverage for needed services, including behavioral health services. Many consumers cannot access health care services, such as behavioral health treatment or habilitative services, without coverage.

Thank you for your consideration of our testimony. If any additional information would be helpful, please contact Robyn Elliott at relliott@policypartners.net or (443) 926-3443.