



Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc  
2101 East Jefferson Street  
Rockville, Maryland 20852

March 2, 2022

The Honorable Delores G. Kelley  
Senate Finance Committee  
3 East, Miller Senate Office Building  
11 Bladen Street  
Annapolis, Maryland 21401

**RE: SB 728 – Support**

Dear Chair Kelley and Members of the Committee:

Kaiser Permanente is pleased to support SB 728, Health Insurance – Qualified Resident State Subsidy Program (Access to Care Act).

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.<sup>1</sup> Kaiser Permanente of the Mid-Atlantic States, which operates in Maryland, provides and coordinates complete health care services for approximately 800,000 members. In Maryland, we deliver care to over 460,000 members.

Kaiser Permanente provides care and coverage to undocumented immigrants in California, Oregon, Washington, and the District of Columbia, and will soon provide care and coverage in Colorado, when their program is implemented soon.

Undocumented immigrants are at high risk of being uninsured because they have limited access to coverage options. Their high uninsured rates reflect limited access to employer-sponsored insurance and eligibility restrictions that bar them from participating in Medicare, Medicaid, the Children’s Health Insurance Program, and the Affordable Care Act marketplaces. Additionally, certain lawfully present immigrants lack access to affordable health coverage, such as those who have been in the United States for less than five years.

We support extending coverage for noncitizens who would otherwise be eligible for coverage but for their immigration status. We especially endorse this effort to expand coverage in response to the significant burden immigrants have faced during the pandemic. COVID-19 has taken a heavy toll on immigrants, who are disproportionately frontline workers, making them particularly vulnerable to the virus.

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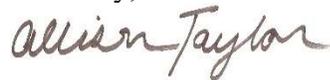
<sup>1</sup> Kaiser Permanente comprises Kaiser Foundation Health Plan, Inc., the nation’s largest not-for-profit health plan, and its health plan subsidiaries outside California and Hawaii; the not-for-profit Kaiser Foundation Hospitals, which operates 39 hospitals and over 650 other clinical facilities; 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 SB 728  
March 2, 2022

SB 728 proposes to create a Qualified Resident State Subsidy Program, which requires the Maryland Health Benefit Exchange to submit a 1332 waiver to the Centers for Medicare and Medicaid Services. We note that other states who provide coverage to undocumented immigrants do so through their Medicaid or public option programs using state-only funding, rather than under a 1332 waiver. Kaiser Permanente thinks it is unlikely that CMS would be able to waive provisions of law barring undocumented immigrants from enrollment in qualified health plans and allow Maryland to recoup and reinvest federal savings, especially since SB 728 does not identify a specific source of state funding to support the waiver application. Nevertheless, we support the waiver application and stand ready to work with the state to implement this initiative, if approved.

Thank you for the opportunity to comment. Please feel free to contact me at [Allison.W.Taylor@kp.org](mailto:Allison.W.Taylor@kp.org) or (202) 924-7496 with questions.

Sincerely,

A handwritten signature in cursive script that reads "Allison Taylor".

Allison Taylor  
Director of Government Relations  
Kaiser Foundation Health Plan of Mid-Atlantic States, Inc.