

Delegate Shane Pendergrass, Chair  
Delegate Joseline Pena-Melnyk, Vice- Chair  
House Health and Government Operations Committee  
Maryland House of Delegates  
6 Bladen Street  
Annapolis, MD 21401



MARYLAND  
ONCOLOGY  
HEMATOLOGY

March 10, 2022

**Support HB 755, HB 1006, and HB 1008 if Amended  
Proposed Amendment: Repeal Insurance Sections 15-1611.1c and 15-1612b**

Honorable Chair Pendergrass, Vice-Chair Pena-Melnyk, and Members of the HGO Committee,

On behalf of Maryland Oncology Hematology (MOH), we would like to thank you for the opportunity to submit written testimony **regarding HB 755; HB 1006; and HB 1008** which are scheduled to be considered in your committee. We applaud the intent of all of these measures but **would like to propose an amendment** in support of each of them that we believe would enhance their effectiveness and would garner our full support.

MOH is the largest independent Medical Oncology and Hematology group in Maryland with over 45 physicians practicing at 14 locations across Maryland. We provide thousands of Maryland patients with increased access to integrated, evidence-based cancer care and extensive opportunities to participate in clinical trials. We believe it is beneficial to our patients that their therapies are provided in a community setting where they can remain close to their home and their family.

As a component of our service to our patients and our community, we continuously advocate for legislation that would protect cancer patients from policies that could negatively impact their access to convenient, timely, and high-quality care. We celebrate the positive steps that these bills take toward patient protections; however, we feel that further amendment would align current statute to better support their intent:

- **HB 755: Pharmacy Benefits Managers- Prohibited Actions:** We are in support of this bill's prohibitions on PBM policies that mandate the use of mail order in order to cover a prescription fill. However, Insurance Sections 15-1611.1c and 15-1612b if left in statute would undermine the effectiveness of this bill as it relates to specialty medications. Both Sections of statute would need to be repealed in order for this legislation to have its intended impact.
- **HB 1006: Pharmacy Benefits Managers- Network Adequacy, Credentialing, and Reimbursement:** Repealing Insurance Sections 15-1611.1c and 15-1612b would significantly improve the impact of the network adequacy provisions put forward in HB 1006. Removing the anti-steering exemptions for specialty drugs and mail order drugs would enable this bill's network adequacy language to apply to specialty pharmacy networks as well as validate the bill's prohibitions on PBMs using mail order pharmacies in their network adequacy calculations.
- **HB 1008: Pharmacy Benefits Managers and Purchasers- Beneficiary Choice of Pharmacy:** The repeal and replacement of Insurance Section 15-1611.1c is currently included in HB 1008 and we very much support that. We would like to put forward that the repeal of Section 15-1612b also be included in order to clean up other statute that could impede this bill's implementation.

If you have any further questions regarding our position on these measures, please don't hesitate to reach out. We welcome the opportunity to be a further resource for you. Thank you for your time and we hope that you will consider joining us in our support for these bills with recommended amendments.

Sincerely,

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President, MOH

Kashif Firozvi, MD  
Managing Partner, MOH

Robert Davis, MBA, MSIS  
Executive Director, MOH