

HEALTH CARE FOR THE HOMELESS TESTIMONY
IN SUPPORT OF
HB 374 – Health Insurance – Pharmacy Benefits Managers – Audits of
Pharmacies and Pharmacists

Senate Finance Committee
March 29, 2023



Health Care for the Homeless supports HB 374, which would strengthen Maryland's existing pharmacy audit laws. As amended, the bill expands the applicability of audits of a pharmacy or pharmacist to all pharmacy benefits managers (PBMs), including those used by Medicaid managed care organizations (MCOs). The bill establishes requirements and prohibitions regarding audits by pharmacy benefits managers, including provisions related to audit limits, the acceptance of certain documents as proof the recoupment of funds or charging for prescriptions of unbreakable package sizes, access to financial documentation, and audit documentation.

PBMs often capture back funds from pharmacies for often trivial prescription deficiencies when the patient received the correct medication. An example might be capturing back the funds paid to a pharmacy for a Suboxone prescription when the physician forgot to put their X-DEA number on the prescription. A more robust auditing process would capture this type of action.

At Health Care for the Homeless, we see one of the most vulnerable populations – individuals and families experiencing homelessness. Having an on-site pharmacy ensures that clients can easily access and pick up their medications. Ensuring the sustainability of our pharmacy partner is critical to ensuring health access for our patients. Strengthening the auditing process will go a long way to meeting this goal.

We request a favorable report on HB 374.

Health Care for the Homeless is Maryland's leading provider of integrated health services and supportive housing for individuals and families experiencing homelessness. We work to prevent and end homelessness for vulnerable individuals and families by providing quality, integrated health care and promoting access to affordable housing and sustainable incomes through direct service, advocacy, and community engagement. We deliver integrated medical care, mental health services, state-certified addiction treatment, dental care, social services, and housing support services for over 10,000 Marylanders annually at sites in Baltimore City and Baltimore County. For more information, visit www.hchmd.org.