



February 25, 2025

The Honorable Pamela Beidle
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401

Re: SB 919 – Audiology Practice – Definitions – FAVORABLE

Dear Chair Beidle, Vice Chair Hayes and Members of the Finance Committee:

On behalf of the Maryland Academy of Audiology, we support SB 919 as drafted.

You had the courage last year to work hard to pass landmark legislation that increased access and affordability for Marylanders to receive timely audiology services. We want to thank Senator Gile for her incredible tenacity and leadership in shepherding this bill through to final passage and into law.

You will hear *since* the passage of your bill how it has literally saved lives by allowing Audiologists to order (not perform) radiographic imaging when a tumor is suspected.

At the request of MedChi and others, the Governor allowed the bill to go into effect but asked that we come back and try and refine the definition of allowing Audiologists to conduct ‘health screenings’.

We worked with MedChi and the ENTs and came up with an almost 100% agreement on compromise language. We agreed to clarify that health screenings are “related to auditory or vestibular conditions.” We also added “or required by federal state or third-party payors”.

It seems that the only real concern with the bill is whether the phrase should be ‘federal or state agencies’ or whether it should be “federal, state or third-party payor”.

We are respectfully insisting that ‘third-party payors’ as drafted in the bill be retained for the reasons you will hear. Federal programs such as Medicare and State programs such as Medicaid

do not include private third-party payors. For example, people who use Medicare Advantage – that is a private third-party payor - not a federal or state agency or program. We must ensure that any ‘health screening’ requirements under Medicare Advantage or any other similar program will not jeopardize any potential reimbursements we may receive under any other health insurance program.

There is some concern that the use of ‘third-party payor’ is not used in the Health Occupations Article and in Health Article generally. We believe that no health occupation should be afraid to reference ‘third-party payor’ as it is all through those relevant sections in those Articles and more. (See attached references below).

In further discussions with MedChi, after we rejected deleting ‘third-party payor’, we discussed language with MedChi Executive Director, Gene Ransom, and after a back and forth, the Maryland Academy of Audiology agreed to accept his offer of language as an amendment. Subsequently, we were informed that the ENTs would not accept that language even though it actually benefited those ENTs that have Audiologists in their practice.

We still would accept that language to be incorporated in the bill. It says:

"NOTHING IN THIS SECTION SHALL PRECLUDE AN AUDIOLOGIST FROM PERFORMING HEALTH SCREENINGS MANDATED BY THIRD-PARTY PAYORS, NOR SHALL AN INSURER OR THIRD-PARTY PAYOR DENY PAYMENT FOR ANY MANDATED HEALTH SCREENINGS OR RELATED SERVICES."

We then countered with another offer of suggested language that accomplishes the same purpose. Section 1-208(A)(3) of the Health Occupations article defines “Third-Party Payor”. We suggested inserting on Page 2, lines 15-16:

“The conducting of health screenings RELATED TO AUDITORY OR VESTIBULAR CONDITIONS OR REQUIRED BY FEDERAL, STATE OR ANY ENTITY AS DEFINED IN THE HEALTH OCCUPATIONS ARTICLE, 1-208(A)(3).

In sum, we can accept the bill as originally introduced or either amendment above which protects the Audiologists who are performing health screenings and those required by those private plans who are outside of the definition of a federal or state agency.

We thank Senator Gile and the Finance Committee for ensuring the best practices for health care screenings by Audiologists are available and affordable for your constituents appropriately recognized.

Please see the attached references to ‘Third-Party Payors’ in the Health Occupations, Health General and other related Articles.

Respectfully submitted,
Gil Genn

“THIRD PARTY PAYOR” – USE IN HEALTH OCCUPATIONS ARTICLE

H.O. 1-208 Uniform Claim Forms

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=cb2939e0-4245-4393-9048-684e88c8d2b0&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX91-DYB7-W23H-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr5&pditab=allpods&ecomp=6s65kkk&earg=sr5&prid=0dc982aa-9555-41fe-a69b-89b34f271a92>

H.O. 1-302 – Prohibited Referrals

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=1da39971-ea12-4702-a374-389614134f7b&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A661B-70Y3-CGX8-01FK-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr14&pditab=allpods&ecomp=6s65kkk&earg=sr14&prid=07438077-9a6c-406e-b85c-be9800429b4a>

H.O 1-304 – Disclosure to Third Party Payors

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=2d78ccf2-b961-4258-ad2c-f71240186d55&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX91-DYB7-W24F-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr0&pditab=allpods&ecomp=6s65kkk&earg=sr0&prid=62a842cb-7a02-45a1-a848-091e6ddd6300>

H.O. 1-306 – Direct Billing of Anatomic Pathology Services

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=3214a885-a24a-4f6c-b699-1c618e6941bf&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX91-DYB7-W24H-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr12&pditab=allpods&ecomp=6s65kkk&earg=sr12&prid=07438077-9a6c-406e-b85c-be9800429b4a>

H.O. 4-103 Dental Practice to Be Owned by Dental Practice

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=4c224684-73cf-4bba-8639-2dd57c5560dc&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX91-DYB7-W2F7-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr14&pditab=allpods&ecomp=6s65kkk&earg=sr14&prid=85e9e273-0eb4-4300-81d5-b4a354ed53e1>

H.O. 14-404 Denials, Probations, Reprimands, Suspensions, Revocations

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=a7181ef7-fe0a-4d55-b5fb-1652dc7a7701&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX91-DYB7-W3GB-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr21&pditab=allpods&ecomp=6s65kkk&earg=sr21&prid=82ea3a71-08aa-40c6-bbbc-1448bcca61be>

“THIRD PARTY PAYOR” – USE IN HEALTH GENERAL ARTICLE

Health General 19-4A-10 Reimbursement By Third Party Payor

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=ae93a85a-3a68-4d58-b392-c482dc943309&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX11-DYB7-W1YS-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr1&pditab=allpods&ecomp=6s65kkk&earg=sr1&prid=86e8fc80-c3ef-48b6-a03f-cc06642c140e>

Health General 19-350.1 – Uniform Claims Forms

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=b9e498ff-daa7-46aa-95e8-7aababa8f474&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX11-DYB7-W1VT-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr4&pditab=allpods&ecomp=6s65kkk&earg=sr4&prid=995ebc65-fff8-4ba8-919d-1502a82bc271>

Health General 19-319 - Qualification of Licenses

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=380ec474-c723-4fb6-aa63-4675178f6c80&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A6893-0Y63-CGX8-01M3-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr7&pditab=allpods&ecomp=6s65kkk&earg=sr7&prid=995ebc65-fff8-4ba8-919d-1502a82bc271>

Health General 4-305 - Disclosures Without Authorization of Persons of Interest

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=8fe9c255-0ae0-4d95-885c-9e6f74abadde&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A688G-7CY3-CGX8-04KS-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr8&pditab=allpods&ecomp=6s65kkk&earg=sr8&prid=995ebc65-fff8-4ba8-919d-1502a82bc271>

Health General - 7.5-501 Establishment of Hotline

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=e77b6556-67d3-4e29-b9c6-112b66d3fa61&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX11-DYB7-W092-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr1&pditab=allpods&ecomp=6s65kkk&earg=sr1&prid=86e8fc80-c3ef-48b6-a03f-cc06642c140e>

[00&pdcontentcomponentid=234188&pdteaserkey=sr12&pdtab=allpods&ecomp=6s65kkk&earg=sr12&prid=08e88787-1f63-49cc-8583-d1f3802ed637](https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=cd18f540-2e02-4acd-8d3f-a726ffaf5b2f&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX01-DYB7-W51P-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr12&pdtab=allpods&ecomp=6s65kkk&earg=sr12&prid=08e88787-1f63-49cc-8583-d1f3802ed637)

Health General - 2-803

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=cd18f540-2e02-4acd-8d3f-a726ffaf5b2f&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX01-DYB7-W51P-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr17&pdtab=allpods&ecomp=6s65kkk&earg=sr17&prid=08e88787-1f63-49cc-8583-d1f3802ed637>

Health General - 19-126 Certificate of Need

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=c057b64a-d2d6-43c3-9502-438d9025cdb6&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VX11-DYB7-W1NC-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr18&pdtab=allpods&ecomp=6s65kkk&earg=sr18&prid=08e88787-1f63-49cc-8583-d1f3802ed637>

“THIRD-PARTY PAYOR” - USE IN INSURANCE ARTICLE

Insurance – 14-138 Disclosure of Medical & Claims Information

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=a94d7382-953f-4f44-969e-8710801dadee&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VXT1-DYB7-W0N0-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr6&pdtab=allpods&ecomp=6s65kkk&earg=sr6&prid=c03a4736-2b93-42f5-8c80-fec97781dffd>

Insurance – 15-1003 Uniform Claims Forms Required

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=c86cdc5c-af72-45b1-8eda-e5cdc4407b07&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VXT1-DYB7-W12K-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr10&pdtab=allpods&ecomp=6s65kkk&earg=sr10&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

15-10B-01 Definitions

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=9258a613-0d6e-44e0-8727-74d60a56706f&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAFBvZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VXT1-DYB7-W13D-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr15&pdtab=allpods&ecomp=6s65kkk&earg=sr15&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

Insurance – 15-10B-05 Certificates – Additional Information

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=d511785d-1529-4367-80e0-f1a98f33112a&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBVZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VXT1-DYB7-W13J-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr11&pditab=allpods&ecomp=6s65kkk&earg=sr11&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

“THIRD-PARTY PAYOR” – USE IN TRANSPORTATION ARTICLE

Transportation – 5-415 Ambulance Transport Fees

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=12946763-c9be-4293-b6de-97bebb39e381&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBVZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-W1B1-DYB7-W3RH-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr16&pditab=allpods&ecomp=6s65kkk&earg=sr16&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

Transportation – 15-212 Refusal, Suspension, Revocation of License

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=bdfcca49-6175-4c15-94f5-8387243e2b24&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBVZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-W1B1-DYB7-W515-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr23&pditab=allpods&ecomp=6s65kkk&earg=sr23&prid=77443d51-96cb-44d5-961f-873c22822424>

“THIRD-PARTY PAYOR” – USE IN CORRECTIONAL SERVICES ARTICLE

Correctional Services – 11-203 Health & Welfare of Incarcerated Individuals

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=296e3a23-1ad6-4850-b045-494136d8fa63&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBVZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VT71-DYB7-W0TX-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr13&pditab=allpods&ecomp=6s65kkk&earg=sr13&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

“THIRD-PARTY PAYOR” – USE IN ESTATES & TRUSTS ARTICLE

Estates & Trust – 3-410 Payment of Elective Share

<https://advance.lexis.com/documentpage/?pdmfid=1000516&crd=55b6b8bd-c803-4d94-98d3-6575407237ef&config=014EJAA2ZmE1OTU3OC0xMGRjLTRINTctOTQ3Zi0wMDE2MWFhYzAwN2MKAfBVZENhdGFsb2e9wg3LFiffInanDd3V39aA&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A63SM-VW81-DYB7-W0JK-00008-00&pdcontentcomponentid=234188&pdteaserkey=sr19&pditab=allpods&ecomp=6s65kkk&earg=sr19&prid=bd0d7556-e533-4282-9109-db7ba4fc8f71>

