



## DEPARTMENT OF HEALTH

Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary

March 15, 2025

The Honorable Joseline Peña-Melnyk  
Chair, House Health and Government Operations Committee  
241 House Office Building  
Annapolis, MD 21401-1991

**RE: House Bill (HB) 1301 - Maryland Medical Assistance Program, Maryland Children's Health Program, and Health Insurance – Transfers to Special Pediatric Hospitals – Prior Authorizations - Letter of Support with Amendments**

Dear Chair Peña-Melnyk and Committee Members:

The Maryland Department of Health (Department) respectfully submits this letter of support with amendments for House Bill (HB) 1301 - *Maryland Medical Assistance Program, Maryland Children's Health Program, and Health Insurance – Transfers to Special Pediatric Hospitals – Prior Authorizations*. HB 1301 prohibits Maryland Medicaid and its Managed Care Organizations (MCOs) from prior authorizations of transfers to special pediatric hospitals.

As of January 2025, at least six of the nine MCOs have stopped requiring prior authorizations for transfers to Mount Washington Pediatric Hospital, the predominant specialty pediatric hospital impacted by this legislation. The six MCOs that waive prior authorization continue to apply concurrent review and other utilization management to ensure that the care provided after transfer is medically appropriate. The concurrent review process starts from the date of admission. When a similar policy that suspended prior authorization for hospital transfers was in place during the COVID-19 Public Health Emergency (PHE), notification by the receiving facility to the MCO was required within 72 hours of admission.

As written, this legislation would prohibit prior authorization of *all* transfers to specialty pediatric hospitals, including to those located out of state, which is expected to result in a significant fiscal impact. To eliminate the projected fiscal impact of this bill, the Department respectfully requests an amendment to make the provisions applicable only to specialty pediatric hospitals located within Maryland. If you would like to discuss this further, please do not hesitate to contact Sarah Case-Herron, Director of Governmental Affairs at [sarah.case-herron@maryland.gov](mailto:sarah.case-herron@maryland.gov).

Sincerely,

Ryan Moran, DrPH, MHSA  
Acting Secretary

In the House Health and Government Operations Committee:

**AMENDMENTS TO HOUSE BILL 1301**

(First Reading File Bill)

On page 3, in line 13, after “HOSPITAL” insert “WITHIN THE STATE OF MARYLAND”.

On page 3, in line 27, after “HOSPITAL” insert “WITHIN THE STATE OF MARYLAND”.