



Maryland Community Health System

Committee:	House Health Committee
Bill:	House Bill 917 – Health Insurance - Retroactive Denial of Reimbursement
Hearing Date:	February 26, 2026
Position:	Support

The Maryland Community Health System supports *House Bill 917 - Health Insurance - Retroactive Denial of Reimbursement*. The bill limits when health insurers can retroactively deny payment to health care providers. The bill restricts denials to specific circumstances, such as coordination of benefits issues, and imposes strict time limits on when insurers can seek repayment. The bill also requires insurers to provide clear written explanations, supporting documentation, and an opportunity for providers to respond before a denial is finalized. The bill increases transparency and protects providers from unexpected or outcome-based payment clawbacks.

MCHS is a network of federally qualified health centers (FQHCs) providing somatic, behavioral health, and dental care to underserved communities across Maryland. We support the bill because it would reduce the financial risk and administrative burden associated with insurers retroactively taking back payments for services they've already provided. FQHCs often serve low-income, uninsured, and Medicaid populations and operate on tight budgets, so unpredictable retroactive denials can create cash-flow problems and threaten their ability to provide care. Limiting when insurers can retroactively deny payments and requiring clearer explanations can make revenue more stable and predictable. That stability helps FQHCs maintain services for medically underserved patients without absorbing unexpected losses from retrospective insurer actions.

Thank you for consideration of our testimony. If we can provide any additional information, please contact Michael Paddy at mpaddy@policypartners.net.